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Kugluktuk

Bathurst Inlet  
Kingaok

Bay Chimo  
Umingmaktok

Cambridge Bay  
Ikaluktutiak

Gjoa Haven  
Okhoktok

Taloyoak

Kugaaruk

Keith Morrison  
Manager, Project Monitoring  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU  
X0B 0C0

June 23<sup>rd</sup>, 2025

**Re: Review of B2Gold Nunavut's 2024 Annual report for Back River  
Project Certificate NIRB No. 007.**

Dear Keith Morrison, the KIA has reviewed B2Gold Nunavut's 2023 Annual Report for the Back River Project Certificate NIRB No. 007.

**1) Compliance Monitoring:**

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with B2Gold Nunavut. cover terms and conditions of NIRB Project Certificate 007.

The Framework Agreement is a confidential agreement between KIA and B2Gold Nunavut that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by Sabina to the KIA, which is summarized as follows:

B2Gold Nunavut is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, B2Gold Nunavut is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.

This annual report is to provide information on:

- Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails.
- Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records.
- Drilling programs, locations, and methods.



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through the IIBA Implementation Committee (IC), B2 Gold Liaison, and the IIBA Manager. Ecosystem effects is to be reported through the Inuit Environmental Advisory Committee (IEAC) established in 2023.

The Implementation of the Back River IIBA and the establishment of the Back River IIBA Implementation Committee was accomplished on December 12, 2022. The KIA and Sabina have had 10 IIBA IC meetings to date.

The 2024 Socio-Economic Monitoring Report submitted to NIRB was reviewed by KIA. The KIA has noted the desire for more Heavy Equipment Operator training by Inuit staff at the Back River Project, as well as the desire for more country food to be offered on site. These matters will be discussed further in the next IIBA Implementation Committee.

### **Inspection of Back River Project**

The KIA conducted its site inspection of the Back River Project from August 26 to 28, 2024. The KIA had conducted its inspection of Goose Lake Camp, the Marine Laydown Area (MLA), but was unable to inspect George Lake Camp due to inclement weather. KIA's internal report were provided to B2Gold Nunavut.

### **Internal Report on Back River Project – August 26 to 28, 2024**

#### **Summary**

The inspection of Goose Lake Camp, and Marine Laydown Area (MLA) facilities was conducted from August 26 to 28 as per an established inspection schedule. John Roesch and Jennifer Amagoalik of KIA, and Merle Keefe of B2Gold Nunavut conducted the inspection. Eighty-six (56) site components out of 86 components were inspected in accordance with KIA's established schedule at two of the three locations. George Lake Camp was not inspected due to inclement weather. Overall, the Goose Lake Mine Site and MLA are well maintained and in good condition.

There has been a lot of development and current construction within the Goose Lake Mine Site area. The mine site accommodation building is open and in use. The surrounding area is currently under construction with several buildings to accommodate the mine, such as a new storage facility, a crushing facility, a new water treatment plant, additional fuel tanks/expansion of the tank farm, and new buildings for IT support, carpentry/welding fabrication, and millwright support. Along with the new buildings around the accommodations camp area there are extended laydown and new laydown areas.



One main issue to note along the Goose Lake Mine Site is within their c-can storage laydown. The laydown requires regrading and leveling as it is uneven, causing some c-cans to tilt. Some of the c-cans containing reagent and resin chemicals were wide open and on uneven ground. If spilled and exposed, these chemicals can cause damage to the environment and cause health issues to wildlife.

Culverts along Goose Lake Mine Site and Umwelt Road are all in good condition. The airstrip is in good condition, and expansion pads are currently being constructed along the airstrip. Berms are being built along the strip to prevent water from going to the airstrip area. There is also a new security building by the airstrip for onloading and offloading passengers.

The MLA camp is in good condition. The fuel pipeline has been completed and in good condition. A Fuel ship was present and unloading fuel at the time of inspection. MLA laydown is being expanded. The Tank Farm is also being expanded from two tanks to five. Accommodation for employees are in good condition.

Due to the weather, the inspection for George Lake Camp was not completed. Merle Keefe of B2Gold Nunavut later on went to George Lake Camp to take pictures of camp components for KIA. KIA has reviewed these pictures and George Lake Camp appears to be in good shape.

## **1) Compliance Status**

In 2024, B2Gold Nunavut completed construction of the plant site, mill and truck shop at the Goose Lake mine site, poured 90% of the concrete and the majority of the structures at the process plant in 2024. Also completed in 2024 at Goose Lake were the accommodations, stripping of Echo Pit and the commencement of mining, continued advancement of the underground decline, and commencement of Umwelt Pit pre-stripping. Fuel tank containment was expanded at the MLA and the MLA was reorganized for maximum space for sealift unload in 2024. All major equipment and materials required for construction were delivered to the MLA and await delivery to Goose Lake in 2025. The Winter Ice Road (WIR) was rebuilt and operated from February 23 to April 15, 2024. Approximately 1,560 loads were transported on the WIR in 2024. The WIR is currently in operation from February 18 to April 30, 2025.

Environmental monitoring and baseline programs including atmospheric, archaeology, water quality, fisheries, wildlife, geochemical, geotechnical, and vegetation programs were conducted by B2Gold Nunavut in 2024 at Back River. Work to be done in 2025 at Back River are the continued development of site roads, pads, and secondary containment facilities, completion of additional bulk fuel tanks and containment modifications, continued mining activities at Echo Pit, Umwelt Pit, and underground, continued harvest of old airstrip esker borrow area, development



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of building foundations, plant site pad development including the process plant and truck shop, and powerhouse.

Additional 2025 work includes building road infrastructure for permanent explosives storage area and Umwelt Saline Water Pond, development of the explosives storage area, upgrading of the accommodation complex and ancillary facilities, extension of the all-weather airstrip, de-watering Umwelt and Llama Lake, exploration drilling, and on-going environmental monitoring programs.

Overall, B2Gold Nunavut. is following its permits, licenses, and agreements.

KIA's consultants find that B2Gold Nunavut has presented adequate information to demonstrate that the Back River Project has complied with project certificate terms and conditions.

## **2) Effects of Monitoring:**

### **a) Whether the conclusions reached by B2Gold Nunavut in the 2024 Annual Report Are Valid.**

KIA's consultants in the areas of wildlife, fisheries, water quality, and geotechnical engineering reviewed the 2024 Annual Report for Back River Project Certificate NIRB no, 007 and the following documents:

- Appendix A. Figure 1
- Appendix B. 2024 Socio-Economic Monitoring Report
- Appendix C. 2024 Wildlife Mitigation and Monitoring Report
- Appendix D. Water Management Plan.
- Appendix E. 2024 Surface Water Quality Report .
- Appendix F. Rascal Stream West Crossing Construction Summary Report.
- Appendix G. Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization.
- Appendix H. 2024 Vegetation Monitoring Program Report.
- Appendix I. 2024 Pre-Shipment Equipment Cleaning.
- Appendix J. 2024 Marine Sampling Report

Overall, our consultants find B2Gold Nunavut's conclusions in the 2024 Annual Report are valid, but with several of the Project Terms of Conditions only being partially met.



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Our consultants comments and recommendations concerning these project certificate conditions will be presented in the next section of our response to NIRB.

- b) **Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.**

## 1.0 Back River 2024 Annual Report to NIRB

### 1.1 KIA-NIRB-01

<b>Review Comment Number</b>	KIA-NIRB-01
<b>Subject/Topic</b>	Air Quality particulate monitoring data missing, PC Condition No. 2
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition No. 2</li> <li>• Results section</li> </ul> Air Quality Monitoring and Management Plan (July 2019)
<b>Summary</b>	There is no reporting of Particulate (TSP and PM2.5) in the 2024 Annual Report, or we could not locate theses data.
<b>Detailed Review Comment</b>	<p>The AQMMP (2019) lists the following components:</p> <ul style="list-style-type: none"> <li>• Passive air quality monitoring of NO2 (baseline collection began in May 2011).</li> <li>• Dustfall monitoring of particulates and metals (baseline collection began in May 2011).</li> <li>• Particulate monitoring of TSP and PM2.5 (baseline collection began in summer 2013).</li> <li>• Meteorological monitoring, which has been ongoing since 2004.</li> <li>• Incinerator stack emissions testing.</li> <li>• Emissions monitoring (e.g., annual fuel use for mobile and stationary equipment and fugitive emissions estimation) to assist in quantification for regulatory reporting (i.e. NPRI, GHGRP).</li> </ul> <p>No reporting is provided in the 2024 Annual Report for particulate monitoring of TSP and PM2.5. The AQMMP (2019) Section 7.3 notes that <i>“particulate monitoring requires dedicated line voltage power and shelter and that monitoring will commence during the construction phase when power and shelter become available.”</i> However, since baseline data collection began in the summer of 2013, as indicated in the bullets above, it is assumed that monitoring capability is in place.</p> <p>The Next Steps section of Project Certificate Condition No. 2 in the</p>





	Annual Report indicates that an air quality monitoring station, including a monitor for fine particulate matter (PM2.5), was installed near the southwest corner of the camp pad in December 2024. Please clarify if this is the monitoring station that will measure TSP and PM2.5 and provide rationale for the omission of this data in the 2024 Annual Report.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please provide rationale on the omission of particulate monitoring (TSP and PM2.5) in the 2024 Annual Report or include (or point the reader to) the missing data.</li> <li>• Please indicate what criteria were used to choose “southwest corner” of the camp pad for installing the online monitoring station.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree with B2B Gold’s assessment of compliance. The 2024 Annual Report does not include reporting for TSP and PM2.5 data, so this condition is non-compliant.
<b>Importance</b>	High

## 1.2 KIA-NIRB-02

<b>Review Comment Number</b>	KIA-NIRB-02
<b>Subject/Topic</b>	Air Quality monitoring site terminology needed, PC Condition No. 1
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition No. 1</li> <li>• Term or Condition Section</li> <li>• Methods section</li> </ul> Air Quality Monitoring and Management Plan (July 2019) <ul style="list-style-type: none"> <li>• Section 7 Sampling Locations for Passive Air Quality Monitoring. Dustfall Monitoring, Particulate Monitoring</li> </ul>
<b>Summary</b>	The AQMMP does not define sample sites as near-field, far-field, and reference site locations, as described in PC Condition No.1 in the 2024 Annual Report.
<b>Detailed Review Comment</b>	The Term or Condition (e) in PC Condition No. 1 in the 2024 Annual Report states that the AQMMP shall include “Identification of near field, far field and reference sites locations with demonstrated consideration for ambient wind conditions”. Near field, far field, and reference site locations (item e) are not clearly defined with these terms in sample locations in Section 7 of the AQMMP (2019). For example, a range of locations was given for dustfall monitoring in the AQMMP (30 m, 100 m, 1 km, 3 km, and 5 km downwind of the area with most activity), which likely correspond to these terms. It would be good to clarify the information for each site by specifically stating



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	which sites are considered near field, far field and reference in the AQMMP for each of the monitoring programs (for Passive Air Quality Monitoring, Dustfall Monitoring, Particulate Monitoring), given that the identification of these sites is expressed as a Term or Condition. Additionally, there is a significant discrepancy between the sampling locations suggested in the 2019 AQMMP report (page 11) and those listed in the 2024 report (pages 4–13).
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please label each monitoring site in the AQMMP with the terms near field, far field, and reference to be consistent with the term and condition (e).</li> <li>• On page 11, please clarify which station is considered as “far field” and describe the logic behind the decision.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree with B2B Gold’s assessment of compliance. The Term or Condition states that these site locations be identified as near field, far field, and reference sites. Site locations are provided, so this Term or Condition is partially compliant, but they need to be identified as belonging to each of these three categories in advance of data collection and analysis.
<b>Importance</b>	Moderate

### 1.3 KIA-NIRB-03

<b>Review Comment Number</b>	KIA-NIRB-03
<b>Subject/Topic</b>	Clarity on Reporting Requirements and the timeline of Project milestones & activities, Air Quality- PC Condition No. 1
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition No. 1</li> <li>• Reporting Requirements Section</li> <li>• Methods Section</li> </ul> Air Quality Monitoring and Management Plan (July 2019)
<b>Summary</b>	B2B Gold states that the AQMMP should be submitted to the NIRB at least 90 days before the start of construction of the Back River Gold Mine Project; however, the timeline for the different Project Phases is unclear in the report's introduction. A figure with a timeline of the pre-construction and construction phases to present would be helpful to clarify whether this condition is being met. According to the information in the Methods section of the 2024 Annual Report PC Condition No. 1, the requirement to provide the updated report within 60 days of revision appears to have been exceeded. The terminology for “significant construction” should be more clearly defined in the Methods section of PC Condition No. 1 in the 2024





	Annual Report. These are suggestions that have been made by KIA in previous years.
<b>Detailed Review Comment</b>	<p>The Introduction for the Annual Report (current and moving forward) would benefit from a figure with a clear timeline marked with key Project milestones/events. For instance, what date did the pre-construction and construction phase begin, and when were various monitoring plans submitted to the NIRB? It is difficult to assess whether the reporting requirements are met if the timeline is unclear. The 2024 Annual Report PC Condition No. 1 Reporting Requirements section states that “Whenever the Proponent makes subsequent revisions to the Air Quality Monitoring and Management Plan, the Proponent shall submit the updated Plan to the NIRB within 60 days of revising the Plan and will ensure the updated Plan is posted on the Proponent's project website.”</p> <p>The 2024 Annual Report PC Condition No. 1 Methods section states that “B2Gold Nunavut's Air Quality Monitoring and Management Plan (AQMMP) was last updated in July 2019 and was provided to the NIRB on April 3, 2020.” This timeline exceeds the 60-day requirement. In the Methods section of Condition No. 1 in the 2024 Annual Report, it states that the updated AQMMP (July 2019) includes:</p> <ul style="list-style-type: none"> <li>• Discussion of data collected prior to significant construction activity</li> </ul> <p>However, there is no definition of “significant construction,” which is ambiguous. The milestones/events that indicate significant construction should be defined, and the date that significant construction begins and when baseline data was collected should be added to the figure of the timeline of Project milestones/activities suggested above.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please provide a figure in the introductory section of annual reports moving forward, with the key Project milestones/activities clearly marked on a timeline.</li> <li>• Please ensure any subsequent AQMMP updates are provided within the 60-day requirement.</li> <li>• Please clearly define what “significant construction activity” entails and provide construction activities on a timeline figure added to the report introduction.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>We disagree with B2B Gold's assessment of compliance. The AQMMP update in 2019 was provided to NIRB nine months after it was completed, which exceeds the 60-day requirement. Thus, B2B Gold was partially compliant with this requirement, with non-compliance in terms of timing of submission. Including a clear timeline may benefit the proponent to ensure that submissions are meeting the timeline requirements by phase.</p>



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<b>Importance</b>	High
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#### 1.4 KIA-NIRB-04

<b>Review Comment Number</b>	KIA-NIRB-04
<b>Subject/Topic</b>	Air Quality needs to indicate additional monitoring and mitigation triggered by exceedances, PC Condition No. 2
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 2</li> <li>• Results section</li> <li>• Next Steps section</li> </ul> <p>Air Quality Monitoring and Management Plan (July 2019)</p>
<b>Summary</b>	The 2024 Annual Report lacks mitigation and additional monitoring details for exceedances.
<b>Detailed Review Comment</b>	<p>The Term or Condition section in PC Condition No. 2 in the 2024 Annual Report states <i>“The Proponent shall demonstrate through monitoring of air quality that all emissions remain within predicted levels and, where applicable, within limits established by all applicable guidelines and regulations. In cases where exceedances occur, the Proponent shall explain the exceedance, describe planned mitigation, and conduct additional monitoring to evaluate the effectiveness of mitigative measures.”</i></p> <p>There is a lack of discussion of mitigation and specific additional monitoring for exceedances in PC Condition No. 2 in the 2024 Annual Report. For instance, results from dustfall monitoring in 2024 indicated an exceedance of the AAAQG for commercial and industrial areas from May 15 to June 15, 2024. The results noted that a helicopter was used to access the Background Station during the retrieval of this sample, and it was hypothesized that airborne dust generated by the helicopter landing may have contaminated the sample. While subsequent monitoring results did not indicate an exceedance, mitigation is necessary when exceedances are found. There is no discussion in the annual report on any further monitoring or mitigation for this exceedance. For instance, was another data retrieval method used instead of a helicopter in subsequent sampling periods?</p> <p>The Next Steps section of PC Condition No. 2 of the 2024 Annual Report indicates the additional monitoring equipment to be installed for the Project. Still, it does not indicate whether this is additional monitoring for exceedances or equipment for newly constructed infrastructure. The report should clearly indicate mitigative action and additional monitoring where exceedances occur.</p> <p>For clarity, it would be helpful to highlight the cells where</p>



## 1.5 KIA-NIRB-05

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### 1.6 KIA-NIRB-06

<b>Review Comment Number</b>	KIA-NIRB-06
<b>Subject/Topic</b>	Missing updated incinerator management plan, PC Condition No.5
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition 5</li> </ul> Incinerator Management Plan (June 2020) Air Quality Monitoring and Management Plan (July 2019)
<b>Summary</b>	Cross-reference to the stack testing information in the AQMMP (2019) should be provided, and updates to the AQMMP (2019) from the updated Incinerator Management Plan (June 2020) should be completed if required.
<b>Detailed Review Comment</b>	The Air Quality Monitoring and Management Plan (July 2019) includes a section for Incinerator Stack Testing, and this should be updated with any relevant information from the updated Incinerator Management Plan (June 2020) for clarity. This cannot be evaluated for consistent information, given that the updated Incinerator Management Plan (June 2020) cannot be located on the NIRB registry. The AQMMP (2019) should also be referenced in the Annual Report Project Certificate Condition No.5 Reference section for completeness of the reference information regarding stack monitoring.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please provide the updated Incinerator Management Plan (June 2020) on the NIRB registry</li> <li>• Please cross-reference any updated relevant information for the revised Incinerator Management Plan (June 2020) in the AQMMP (2019) and update this document if necessary.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree with B2B Gold's assessment of compliance. The updated Incineration Management Plan (June 2020) does not appear on the NIRB website with the submission. Thus, this condition is non-compliant until provided.
<b>Importance</b>	Moderate

### 1.7 KIA-NIRB-07

<b>Review Comment Number</b>	KIA-NIRB-07
<b>Subject/Topic</b>	Omission of required information for GHG monitoring measures, PC Condition No. 6
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)



	<ul style="list-style-type: none"> <li>• PC Condition No. 6</li> </ul> <p>Air Quality Monitoring and Management Plan (July 2019)</p> <ul style="list-style-type: none"> <li>• Greenhouse Gas Emissions</li> </ul>
<b>Summary</b>	<p>The AQMMP (2019) is missing key information about the GHG emission monitoring measures to be undertaken and a description of the data analysis. Additionally, data for incineration and oil combustion in the 2024 Annual Report is missing without explanation, and there is an unsupported assumption that this parameter was negligible in 2024.</p>
<b>Detailed Review Comment</b>	<p>The Term or Condition for the Project Greenhouse Gas Emissions (GHG) Reduction Plan include the following:</p> <ul style="list-style-type: none"> <li>• An estimate of the Project's GHG baseline emissions;</li> <li>• A description of monitoring measures to be undertaken, including the methods, frequency, parameters, and a description of data analysis; and</li> <li>• A description of mitigative and adaptive strategies planned and taken toward reducing the project-related emission of greenhouse gases over the Project's life.</li> </ul> <p>The AQMMP (2019) does not include a specific section on monitoring measures for GHG emissions. Specifically, the plan does not mention the parameters that constitute the data for GHG emissions or details on the calculation of the emissions (data analysis). The plan should include how, when, and where the sources for emissions are recorded/measured and details on the specific equations used to calculate GHG instead of just a reference to the method used.</p> <p>Likewise, the PC Condition No. 6 Results section of the 2024 Annual Report does not demonstrate how emission totals are calculated. Only references to how the individual parameters were calculated are provided. For instance, the PC Condition No. 6 Results section states that Emission factors in Canada's Greenhouse Gas Reporting Requirements (ECCC 2024) were used to quantify emissions from diesel, propane, and waste oil combustion. The Annual Report Methodology section should include the equations used in this guideline. I do not see an equation specifically for waste oil (petroleum) combustion in ECCC (2024), so it would be good to point to the specific equation used for each parameter as a footnote in the table.</p> <p>The 2024 Condition No. 6 Results section states that emissions from ammonium nitrate fuel oil (ANFO) and emulsion explosives were estimated using emission factors retrieved from the National Greenhouse Gas Accountants (NGA) Factors (Australian Department of Climate Change 2008). Could you please provide a link to this document? It is difficult to find, and there are more recent documents on the Australian Department of Climate</p>



	<p>Change website, which only lists editions from 2018 to 2024. It is difficult to evaluate the results of the annual calculations without more specific details.</p> <p>The Results section of PC Condition No. 6 in the 2024 Annual Report states that:</p> <p><i>“The data used to estimate GHG emissions for the above emissions sources are summarized in Table 4.5-4. Note that data used is based on information available at the time of writing, and MLA total waste oil combusted and incineration data were unavailable for the 2024 NIRB Annual Report. However, 2024 GHG emissions from these MLA emission sources are expected to be negligible compared to the Back River Gold Mine Project's 2024 totals based on 2023 data for these sources.”</i> However, in the Trends section of PC Condition No. 6 in the 2024 Annual Report, it states that <i>“Total annual GHG emissions have increased in 2024 in comparison to 2023. This increase is largely attributed to an increase in diesel consumption as Project construction and pit development continued to progress in 2024.”</i></p> <p>Although the total GHG emissions increased in 2024, it is unclear whether the 2023 data would be comparable to 2024, given the total increase. Please provide a rationale for this assumption and provide a reason that the data was omitted or not collected in 2024.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please update the Greenhouse Emissions Reduction Plan in the AQMMP (2019) to include the details of the methods, frequency, parameters, and data analysis used to calculate emissions. Including the specific equations used to calculate each parameter and a link to the source documents for the equations.</li> <li>• Please provide rationale for if waste oil combustion and incineration data for 2024 would be nil and comparable to 2023 and provide the reason for this data omission in 2024.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>We disagree with B2B Gold's assessment of compliance. Details on the methods and calculations for GHGs are lacking in the AQMMP (2019) and in the 2024 Annual Report. Thus, B2B Gold is not compliant with this Term or Condition.</p>
<b>Importance</b>	High

### 1.8 KIA-NIRB-08

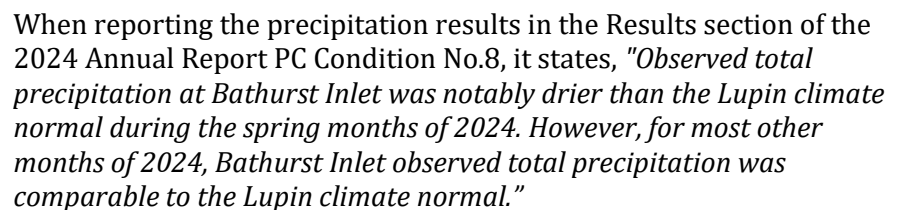
<b>Review Comment Number</b>	KIA-NIRB-08
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<b>Subject/Topic</b>	Omissions/errors in climate and meteorology results. PC Condition No. 8
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>PC Condition No. 8</li> </ul>
<b>Summary</b>	<p>The onset of freeze-thaw cycles and the highlight of any extreme or outlying weather events were omitted from the PC Condition No. 8 section of the 2024 Annual Report.</p> <p>There were minor errors when reporting the average monthly temperature and precipitation results in the 2024 Annual Report PC Condition No. 8 Results section.</p>
<b>Detailed Review Comment</b>	<p>The Term or Condition section of PC Condition No. 8 states, “The Proponent shall provide a summary report of meteorological conditions experienced within the project area including details related to temperature, wind velocities and patterns, precipitation, as well the onset of seasonal freeze and thaw cycles and highlight extreme or outlying weather events.” The 2024 Annual Report presented results for most of these parameters; however, no data were included for freeze-thaw cycles or extreme or outlying weather events. There is no mention of freeze-thaw cycles in the AQMMP (2019) or how those events will be measured (e.g., ice on/off a waterbody, freezing or thawing of permafrost, temperature threshold).</p> <p>Even if there are no extreme or outlying weather events during the year, this should be clearly stated in the Annual Report so there is no confusion about whether this is an omission or if there is no data to provide.</p> <p>The Results section of the 2024 Annual Report PC Condition No.8 states, “Figure 4.5-1 presents the monthly mean temperatures observed at the Goose station and Bathurst Inlet in 2 compared to the 1991-2020 Lupin Composite station climate normal. Average monthly temperatures recorded at the Goose Lake station in 2024 were warmer than the climate normal averages from Lupin for all months except for January, March and June.”</p> <p>However, in the corresponding figure, the Goose Lake average temperature in 2024 is also warmer than the climate average normal for Lupin. This text should be revised to read that “<i>Average monthly temperatures recorded at the Goose Lake station in 2024 were warmer than the climate normal averages from Lupin for all months except for January and March</i>”.</p>



**Figure 4.5-5 Bathurst Inlet 2024 Monthly Total Precipitation Summary (TC8-5)**



- Please provide data on freeze-thaw cycles and any extreme or outlying weather events (or state that no events occurred in the results section of 2024 Annual Report PC Condition No.8.
- Update the AQMMP (2019) to include the type of data and where and when they are recorded to measure freeze-thaw cycles for PC Condition No. 8
- Please revise the Results section of the 2024 Annual Report



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	<p>PC Condition No.8 to indicate that Average monthly temperatures recorded at the Goose Lake station in 2024 were warmer than the climate normal averages from Lupin for all months except for January and March.</p> <ul style="list-style-type: none"> <li>Please revise the precipitation Results section of the 2024 Annual Report PC Condition No.8 to indicate that the total precipitation observed at Bathurst Inlet was notably drier than the Lupin climate normal during the spring months and in August of 2024.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree with B2B Gold's assessment of compliance with this condition. The 2024 annual report omits freeze-thaw cycle data, so B2B Gold is partially compliant.
<b>Importance</b>	High

### 1.9 KIA-NIRB-09

<b>Review Comment Number</b>	KIA-NIRB-09
<b>Subject/Topic</b>	Noise dosimeter data, PC Condition No. 9
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>PC Condition No. 9</li> </ul> <p>Back River Project Noise Abatement Plan, Version 2</p>
<b>Summary</b>	Personal noise dosimeter data is missing in the PC Condition No. 9 Results section and cannot be found in an appendix.
<b>Detailed Review Comment</b>	<p>Section 11 of the Back River Project Noise and Abatement Plan (Version 2) states, <i>"The Noise Abatement Plan will be reported on each year during construction and operation. The report will include monitoring data from the monitoring programs. Reporting on mitigation and management activities, including performance, will be reported in an appendix."</i></p> <p>The results section of PC Condition No. 9 says that <i>"From September to end-of-year 2024, a total of 62 individual samples have been taken using personal noise dosimeters. Attached herein is the year-to-date personal noise data collected"</i>. No data are provided in the 2024 Annual Report PC Condition No. 9 Results section, and no appendix with this data could be located on the NIRB registry.</p> <p>Without the noise dosimeter results, it is difficult to determine if the following Term or Condition is met: <i>"The Proponent shall demonstrate that noise levels will remain within reasonable limits and no further mitigation (e.g., additional soundproofing) is required."</i></p>



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<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>Please provide the September to end-of-year 2024 personal noise dosimeter data or provide rationale for omission of this data.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree that B2B Gold is compliant with this condition, given that no personal dosimeter data was provided in the 2024 Annual Report.
<b>Importance</b>	High

### 1.10 KIA-NIRB-10

<b>Review Comment Number</b>	KIA-NIRB-10
<b>Subject/Topic</b>	Missing data/information for worker health and safety and to mitigate impacts on wildlife, PC Condition No. 10
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>PC Condition No. 10</li> </ul> Back River Project Noise Abatement Plan, Version 2
<b>Summary</b>	The 2024 Annual Report and the Noise Abatement Plan (Version 2) lack various data, references, and information on mitigation and monitoring. Specifically, the Wildlife Mitigation and Monitoring Plan is missing as a reference in the PC Condition No. 10 Reference section, where noise impacts to wildlife are covered. Details specific to mitigation and monitoring for wind turbines are currently missing from the Back River Project Noise Abatement Plan, Version 2. Data from 62 individual samples from personal noise dosimeters is missing from the 2024 Annual Report, despite stating in the Results section of PC Condition No. 10 that the data was attached.
<b>Detailed Review Comment</b>	The Objective of the PC Condition No. 10 is to ensure worker health and safety and to prevent and mitigate potential impacts on terrestrial wildlife, including caribou, birds, moose, musk ox, foxes, wolves, etc. Wildlife are not covered in the Noise Abatement Plan, Version 2, but this plan refers to the Wildlife Mitigation and Monitoring Plan. There should be some specific reference to mitigations used to protect wildlife in the Noise Abatement Plan while referencing the Wildlife Mitigation and Monitoring Plan and specific sections that cover noise abatement. The Wildlife Mitigation and Monitoring Plan should be added to the PC Condition No. 10 Reference section to clarify where wildlife noise protection is covered.  The PC Condition No. 10 Term or Condition states that <i>“For the wind turbines specifically, the Proponent shall monitor for both</i>



	<p><i>noise and vibration to confirm that the noise and vibration levels associated with the normal operation of the wind turbines remain within the predicted levels as set out in the 2023 IS Addendum. If monitoring identifies that noise and/or vibration exceeds predicted levels, the Proponent shall explain the exceedance, a description of planned mitigation and shall conduct additional monitoring to evaluate the effectiveness of mitigation measures."</i></p> <p>The Back River Project Noise Abatement Plan, Version 2, does not mention wind turbines; thus, details of mitigation and monitoring specific to wind turbines should be added to that Plan.</p> <p>The results section of PC Condition No. 10 says that "From September to end-of-year 2024, a total of 62 individual samples have been taken using personal noise dosimeters. Attached herein is the year-to-date personal noise data collected".</p> <p>No data are provided in the 2024 Annual Report PC Condition No. 10 Results section, and no appendix with this data could be located on the NIRB registry.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The Wildlife Mitigation and Monitoring Plan should be added as a reference in the PC Condition No. 10 Reference section as this is where noise impacts on wildlife are covered.</li> <li>• Results from the 62 individual samples from personal noise dosimeters should be provided in the 2024 Annual Report.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	We disagree that B2B Gold is compliant with this condition, given that no data for the personal noise dosimeters were provided in the 2024 Annual Report.
<b>Importance</b>	High

### 1.11 KIA-NIRB-11

<b>Review Comment Number</b>	KIA-NIRB-11
<b>Subject/Topic</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition No. 14</li> </ul>
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC Condition No. 14</li> </ul>
<b>Summary</b>	The currently utilized Landfill and Waste Management Plan (August 2022) is not included on the NIRB registry and is not included in the 2024 Annual Report PC Condition No. 14 Reference section.
<b>Detailed Review</b>	In the PC Condition No. 14 Results section of the 2024 Annual



<b>Comment</b>	<p>Report, it states that “the company continues to use the updated Landfill and Waste Management Plan (August 2022) in the interim while the updated 2025 Landfill and Waste Management plan is awaiting approval by the NWB.”</p> <p>The Landfill and Waste Management Plan (August 2022) cannot be located on the NIRB registry despite many different keywords used to search for the document (e.g., Landfill Waste Management Plan, landfill, waste, 2022).</p> <p>If the Landfill and Waste Management Plan (August 2022) is currently being utilized, it should be added to the 2024 Annual Report PC Condition No. 14 Reference section.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please include the Landfill and Waste Management Plan (August 2022) on the NIRB registry</li> <li>• Please include the Landfill and Waste Management Plan (August 2022) in the 2024 Annual Report PC Condition No. 14 Reference section.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>We disagree with B2B Gold’s assessment of compliance. The currently used landfill and waste Management Plan (August 2022) could not be located on the NIRB Registry. Thus, this condition is non-compliant.</p>
<b>Importance</b>	High

### 1.12 KIA-NIRB-12

<b>Review Comment Number</b>	KIA-NIRB-12
<b>Subject/Topic</b>	Permafrost thermal monitoring plan
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 11</li> <li>• Site-Wide Ground Thermal Monitoring Plan (2024)</li> </ul>
<b>Summary</b>	<p>The Proponent will develop a Thermal Monitoring Plan for permafrost mapping and monitoring and submit it (and any updates) to the NIRB at least 60 days in advance (including on the website). No references are provided, and it is unclear when this plan was submitted to the NIRB and whether submission timelines were reached.</p>
<b>Detailed Review Comment</b>	<p>Within the PC Condition No. 11 compliance assessment, N2Gold notes that they contracted SRK consulting to prepare a thermal monitoring plan, but at the time of this submission a draft thermal monitoring plan had only been submitted to B2Gold for review. A search on the nirb.ca website led to the finding of the</p>





	Back River Project: Site-Wide Ground Thermal Monitoring Plan (2024). Since the report is stated to be a “Revision 00” and no date is provided, it's unclear if this is a final version of the plan. It is unclear when this plan was submitted to the NIRB and whether timelines for submission were reached.
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• The Proponent should provide the Thermal Management Plan with the references for the annual report for this condition and make sure it is readily available (easy to find with a link) on the nirb.ca website.</li> <li>• The proponent should clarify when the Plan was submitted to the NIRB and whether timelines for submission were reached.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition based on developing a Thermal Monitoring Plan, initiating some thermal monitoring, and providing a status on monitoring locations. However, we find this partially compliant because the Plan was not provided, and timelines for submissions are not provided.
<b>Importance</b>	Low

### 1.13 KIA-NIRB-13

<b>Review Comment Number</b>	KIA-NIRB-13
<b>Subject/Topic</b>	Incomplete Revegetation and Reclamation Plan
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025), Section 4.5.9 <ul style="list-style-type: none"> <li>• PC Condition No. 35</li> <li>• Mine Closure and Reclamation Plan (November 2015)</li> <li>• Interim Closure and Reclamation Plan (July 2021)</li> </ul>
<b>Summary</b>	The condition relates to providing a progressive revegetation program, but studies are ongoing, and the plan has limited information on revegetation.
<b>Detailed Review Comment</b>	The references provided are available online at the nirb.ca website and consist of the Interim Closure and Reclamation Plan dated July 2021. The original plan (2015) is not mentioned. The latest Plan indicates that <i>“With the exception of WIR subbase upgrades and service emergency camp pads, active revegetation of the Property as part of Closure is not planned given the cold climate setting of the Project as well as the precedent established for mine closure in Nunavut.”</i> Furthermore, it is indicated that a revegetation research and



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	review program was initiated at other northern mine sites and that undertaking revegetation and seeding would provide limited benefits and be outweighed by the logistics and cost constraints, as well as potential environmental impacts due to the northern climate (e.g., growing conditions, availability of native seed, lack of suitable growth medium). Additional studies are ongoing, and additional prescriptions will be provided in a subsequent version of the Plan. Also, it is unclear whether reclamation has been completed for areas used during construction, but that may not be needed anymore and were closed. Finally, it is unclear if the update to the Plan in 2021 was submitted to the NIRB within 60 days of revising the Plan.
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• The proponent should provide the 2015 version of the Plan in the reference list and detail the changes between the 2015 and 2021 Plan and expected changes for a subsequent version (i.e., in 3 years, as identified in the Annual Report).</li> <li>• Provide a statement on whether any areas were closed and revegetated in 2025 (e.g., related to construction).</li> <li>• Provide details on the Plan update and submission date to the NIRB.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. We find this condition partially compliant, considering that the Interim Closure and Reclamation Plan partially addresses the requirement for a complete revegetation plan for closures.
<b>Importance</b>	Low

#### 1.14 KIA-NIRB-14

<b>Review Comment Number</b>	KIA-NIRB-14
<b>Subject/Topic</b>	Missing information to assess compliance for the site footprint.
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• Vegetation Monitoring Plan (January 2020)</li> </ul>
<b>Summary</b>	The condition relates to the monitoring program for terrestrial vegetation. However, the information provided is insufficient to assess compliance fully.
<b>Detailed Review Comment</b>	The references provided consist of the Vegetation Monitoring Plan (January 2020) and Vegetation Monitoring Program (Golder 2019), available on the nirb.ca website. However, these documents only provide some details on how the footprint monitoring will be completed. The results of the footprint



	<p>monitoring are provided in the table of the annual report. While this information is provided (e.g., loss or alteration of vegetation associated with Project activities, including identifying the type of habitat loss resulting from these effects), several details are missing. For example:</p> <ul style="list-style-type: none"> <li>• Efforts to minimize the Project footprint are not provided.</li> <li>• The annual report does not distinguish between construction and progressive reclamation activities.</li> <li>• The annual report does not provide a breakdown of footprint effects for the project's different components, including the Energy Centre infrastructure (wind turbines, solar panel array, Battery Energy Storage System, transmission lines, and service roads).</li> </ul>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the vegetation monitoring program results while including efforts to minimize project footprints, a breakdown between construction and reclamation activities and a breakdown of footprint effects by Project components.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess compliance fully, we find this condition partially compliant.</p>
<b>Importance</b>	<p>Moderate</p>

### 1.15 KIA-NIRB-15

<b>Review Comment Number</b>	KIA-NIRB-15
<b>Subject/Topic</b>	Missing documentation to assess compliance
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 34</li> <li>• Vegetation Monitoring Plan (January 2020)</li> <li>• Appendix H - 2024 Vegetation Monitoring Program Report</li> <li>• Project Certificate 007, Amendment No. 1</li> </ul>
<b>Summary</b>	<p>The condition relates to providing the Vegetation Monitoring Plan and any subsequent updates. However, missing references and details prohibit efficient verification of compliance with this condition.</p>
<b>Detailed Review Comment</b>	<p>The references provided consist of Appendix H of the Annual report (2024 Vegetation Monitoring Program Report (WSP 2025)) and the 2020 Vegetation Monitoring Plan (original plan), which are available on the nirb.ca website. The 2020 Vegetation Monitoring Plan was submitted to the NIRB on January 23, 2020,</p>



	<p>while the recommended terms and conditions in Project Certificate No. 007 were issued by the NIRB in December 2019, indicating that the 60 days were respected. In turn, the 2025 Vegetation Monitoring Plan was submitted to the NIRB on February 18, 2025, while the Project Certificate 007, Amendment No. 1 appears to have been issued on August 7, 2024. This is not within 60 days of the amendment, so it seems that it may have been late. The dates of the Plans are provided in the annual report, but the dates of the Certificate and Amendment issuance were obtained online.</p> <p>The Vegetation Monitoring Plan (2020) is designed to quantify the potential impacts on vegetation from the Project, including the annual construction/operation of the winter ice roads and trails. The original plan identifies a commitment to consult with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties; however, little information is provided on how this will be accomplished other than to state “The plan should be submitted to the NIRB at least 90 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.” Is that the limit of the consultation?</p> <p>The other required information is present in the 2020 version of the Vegetation Management Plan, and the example of the 2024 monitoring report is provided (e.g., with the photo monitoring). However, version 2025 of the plan was not offered or found on the nirb.ca website and could not be verified for the inclusion of the Energy Centre Project Infrastructure (wind turbines, solar panel array, Battery Energy Storage System, transmission lines, and service roads).</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the 2025 Vegetation Management Plan within the annual report and on the nirb.ca website.</li> <li>• The proponent should provide evidence that the 2025 Vegetation Management Plan was submitted with 60 days of the Project Certificate 007, Amendment No. 1 that was issued on August 7, 2024. The dates of Certificate issuance should be provided in the annual report.</li> <li>• The proponent should specify the activities used to consult with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties on the contents of the Vegetation Management Plan.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with condition No. 34. However, considering the missing information to assess compliance, we find it to be partially compliant.</p>



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<b>Importance</b>	Low
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### 1.16 KIA-NIRB-16

<b>Review Comment Number</b>	KIA-NIRB-16
<b>Subject/Topic</b>	References issues and the forthcoming monitoring program
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 18</li> <li>• Tailings Management Plan (2016)</li> </ul>
<b>Summary</b>	<p>The Proponent will undertake an infill geotechnical characterization program and provide information regarding the program's results during construction in the annual report to the NIRB. Subsequently, updates on the program and mitigation measures will be provided every two (2) years in the annual report to the NIRB. However, the Plan is not referenced in the annual report, and this program has not been fully implemented yet, so it cannot be compliant.</p>
<b>Detailed Review Comment</b>	<p>No references are provided in the annual report. The 2016 Tailings Management Plan was found on the nirb.ca website, but it is unclear if this is the plan's latest version. The 2016 version provides details related to seepage analysis, but little information regarding permeability testing and thermal monitoring. It is assumed that these are provided in an updated version of the Plan or other plans (e.g., Site-Wide Ground Thermal Monitoring Plan (2024)).</p> <p>The annual report indicates that B2Gold Nunavut completed an initial infill geotechnical drill program at the Goose Property in March and April of 2018. Further geotechnical drilling was undertaken in 2021. In the future, B2Gold Nunavut will complete the remaining infill geotechnical drill program. However, no results (or links to reports) are provided in the annual report, as requested by the condition.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Any updates to the Tailings Management Plan and references to other relevant plans should be provided in the annual report under this condition.</li> <li>• Results of the infill geotechnical drill program should be provided.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition based on the initial infill geotechnical drill program in 2018 and 2021; however, this condition relates to monitoring infill geotechnical works to ensure the area's stability, and this work is</p>



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	ongoing. We find this partially compliant until the most recent version of the Tailings Management Plan and associated Plans are provided, and the monitoring and annual reporting are completed.
<b>Importance</b>	Moderate

### 1.17 KIA-NIRB-17

<b>Review Comment Number</b>	KIA-NIRB-17
<b>Subject/Topic</b>	Plans for and monitoring tailings and treatment sludges.
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>• PC No. 17</li> <li>• Tailings Management Plan (2016)</li> </ul>
<b>Summary</b>	The Proponent must conduct tests of the tailings and treatment sludges as they are produced to evaluate the potential for remobilization of arsenic from these materials, and the results are to be submitted to the NIRB, the Kitikmeot Inuit Association, and other interested parties annually or as may otherwise be required by the NIRB. This condition cannot be met since the proponent has not started producing tailings.
<b>Detailed Review Comment</b>	The Tailings Management Plan for 2016 was available on the nirb.ca website, but the Plans from 2020 and 2022 were not readily available or could not be found. One of the problems is that different keywords are needed to see the same plan but different years of plans. Further, this condition relates to testing (grab sampling) of the tailings and treatment sludges and reporting results annually, which cannot have occurred since operations have not commenced (i.e., no tailings or sludge produced yet).
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• The Proponent should provide two Tailing Management Plan updates (2020, 2022) on the nirb.ca websites with links in the annual report so that they can be found easily.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition based on the development of the Tailings Management Plan and submission to NIRB in April 2022; however, no tailings have been produced to date, and no testing has been completed, so this condition cannot be compliant. We find this partially compliant until testing and reporting begin.
<b>Importance</b>	Moderate





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### 1.18 KIA-NIRB-18

<b>Review Comment Number</b>	KIA-NIRB-18
<b>Subject/Topic</b>	Missing Plan and forthcoming monitoring
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC condition No. 19</li> <li>• Site Water Monitoring and Management Plan (November 2015)</li> <li>• Appendix D – Water Management Plan (May 2024)</li> </ul>
<b>Summary</b>	<p>The Proponent needs to provide a Saline Water Management Plan submitted (including any updates) to the NIRB at least 60 days in advance (including on the website), with results submitted annually thereafter. The plan is not provided in the annual report, is only a blank page, and is not readily available on the nirb.ca website. Further, this condition relates to monitoring works that have not yet been completed as the conditions state that results of monitoring should be provided annually in the report.</p>
<b>Detailed Review Comment</b>	<p>The references provided are the Type A Water Licence 2AM-BRP1831, the Technical Meeting Commitment Responses (June 2018), the Water Management Plan (October 2020) and the Water Management Plan, (Version 5, May 2024), provided in Appendix D. The Water License does not appear particularly helpful in verifying the compliance of this condition while the Technical Meeting Commitment Responses and the 2020 Water Management Plan are not readily available on the nirb.ca website. The 2024 Water Management Plan is available on the nirb.ca website and is provided in Appendix D of the Annual Report. It was not possible to verify whether the Plan includes the required information because the plan states in Section 9.4.2 (Saline Water Management) that the Saline Water Management Plan (SWMP) <i>“is included an Appendix C to the WMP, and provides details related to the management of saline groundwater in compliance with the Type A Water Licence 2AM-BRP1831 Amendment No.1. The SWMP provides a description of the saline water management, outlines the procedures required to manage the quantity and quality of saline groundwater interacting with Project components throughout the mine life, and characterization of saline water inflows into the underground mine workings. The SWMP also includes monitoring of thermal conditions, monitoring of saline water at the Goose Property, mitigation measures designed to address the potential for higher-than-predicted volumes of saline water inflows into the open pits and the underground mine, and potential water treatment and disposal methods.”</i> However, when</p>



	<p>navigating to Appendix C, we only found a blank page (it was not attached).</p> <p>The Page for Appendix C states that the plan was submitted to the NWB under separate cover on August 30, 2022, while the plan is dated May 2024. This suggests that the updated plan was submitted to the NIRB within 60 days of revising the Plan.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>The Proponent should provide Appendix C within the 2024 Water Management Plan, and it should also be readily available (easy to find with a link) on the nirb.ca website.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition based on providing the updated Water Management Plan and associated Saline Water Management Plan; however, this document could not be found or verified. Further, this condition relates to monitoring works that have not yet been completed, as the condition states that monitoring results should be provided annually in the report. We find this partially compliant until the Plan is provided and the monitoring and annual reporting are completed.</p>
<b>Importance</b>	Low

### 1.19 KIA-NIRB-19

<b>Review Comment Number</b>	KIA-NIRB-19
<b>Subject/Topic</b>	The thermal monitoring plan for hydrological features and hydrogeology is missing, and annual results are not provided
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>PC Condition No. 20</li> <li>Site-Wide Ground Thermal Monitoring Plan (2024)</li> </ul>
<b>Summary</b>	<p>The Proponent will develop a Thermal Monitoring Plan to address the potential changes in permafrost/talik distribution, flow distribution, and flow paths that may be directly or indirectly affected by the Project facilities. Monitoring results should be submitted annually. No references are provided, but the Site-Wide Ground Thermal Monitoring Plan (2024) found on the nirb.ca website offers little detail on monitoring changes in talik distribution or flow distribution and paths that may be affected by the Project. Also, no monitoring results are presented in that annual report.</p>
<b>Detailed Review Comment</b>	<p>No references are provided. A search on the nirb.ca website led to the finding of the Back River Project: Site-Wide Ground Thermal</p>



	Monitoring Plan (2024). This plan does indicate that potential changes in permafrost will be monitored and reported; however, there is little mention of monitoring changes in talik distribution or flow distribution and paths that may be affected by the Project. Also, B2Gold Nunavut states that “ <i>thermal monitoring is currently being completed at Echo Pit,</i> ” but no results are provided in the annual report.
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• The Plan should provide clear information regarding monitoring changes in talik distribution or flow distribution and paths that may be affected by the Project.</li> <li>• The proponent should provide results for installed thermal monitoring sections (e.g., Echo Pit).</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition based on developing a Thermal Monitoring Plan, initiating some thermal monitoring, and providing a status on monitoring locations. We find this partially compliant because the Plan and results of current monitoring were not provided with the annual report, and several years of future monitoring need to happen.
<b>Importance</b>	Moderate

## 1.20 KIA-NIRB-20

<b>Review Comment Number</b>	KIA-NIRB-20
<b>Subject/Topic</b>	Fish passage monitoring is too qualitative and does not address the identified fish passage issues, PC Condition No. 24
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025), Section 4.5.6 <ul style="list-style-type: none"> <li>• PC Condition no. 24</li> <li>• PC Condition no. 26</li> <li>• Appendix G: Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization.</li> </ul>
<b>Summary</b>	The proponent has conditions that require them to ensure that all project infrastructures in watercourses are designed and constructed in such a manner that they do not unduly prevent and limit the movement of water in fish-bearing streams and rivers, unless authorized by DFO. However, the most recent fish passage monitoring appears too qualitative to assess fish passage fully and has identified potential issues with in-water structures that could affect fish passage.
<b>Detailed Review</b>	Generally, it appears that all project infrastructures in



<b>Comment</b>	<p>watercourses were designed and constructed in such a manner that they do not unduly prevent and limit the movement of water. However, the objective of this condition is to allow fish passage as stated in the objective: <i>"To prevent blockages or restrictions to fish passage"</i>.</p> <p>One of the objectives of the Rascal Stream Arctic Grayling Monitoring in 2024 was to assess fish passage within Reach 1 at the constructed weirs by collecting and summarizing flow data. Each weir structure was evaluated for habitat type, point velocity and depth measurements at three representative locations along a cross section above and below each weir structure. A qualitative assessment was completed to evaluate the potential for adult Arctic Grayling to move upstream past each weir based on a low to high rating. It is unclear if any other assessments are completed, but this assessment appears inadequate to reliably assess fish passage at the weir structures (i.e., they are missing data that was not collected, and the evaluation did not include comparisons between Arctic grayling fish swimming speeds and flow during the migration period). Further, it appears that some of the weirs were not functioning as intended since the report (Appendix G) states, <i>"Three weirs were ineffective in providing velocity refugia, in part, because flows were relatively high and overtopping the weir structures" and "One weir was blown out"</i>. The report even recommended, <i>"Ongoing monitoring and maintenance of the rock weir velocity mitigation, including modifications or enhancements to the weir immediately below the chute."</i></p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>Quantitative monitoring of the weirs should be completed to ensure flow effects are not negatively affecting fish passage, particularly for adult Arctic Grayling during the spring migration period.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition based on monitoring effects to date. However, some of the weirs are affecting flow and may be negatively impacting fish passage, so they should likely be partially compliant.
<b>Importance</b>	High

### 1.21 KIA-NIRB-21

<b>Review Comment Number</b>	KIA-NIRB-21
<b>Subject/Topic</b>	Missing references and forthcoming construction of in-water infrastructures



<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) Section 4.5.6</p> <ul style="list-style-type: none"> <li>• PC Condition no. 24</li> <li>• Appendix G: Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization.</li> </ul>
<b>Summary</b>	<p>The condition relates to ensuring that flows are not impeded by all constructed structures in Rascal Stream. Some of the references provided are irrelevant, and others are missing, so it is not possible to assess compliance fully. Further, other in-water structures are planned (e.g., the fishway diversion).</p>
<b>Detailed Review Comment</b>	<p>To assess compliance with this condition, one needs to be able to review the construction monitoring reports for any manmade structures installed in Rascal Stream for the Project, as well as flow and fish passage reports. This includes the two culverts installed, one on the main channel and one on the secondary channel and the weirs. However, some of the documents referenced are not useful (e.g., Letter of Advice, Request for Review Application, WSP crossing construction summary). Further, some of the relevant documents that were referenced could not be found on the nirb.ca website, such as:</p> <ul style="list-style-type: none"> <li>• Golder. 2020. Fish Passage Evaluation, Mitigation, and Monitoring for Rascal Stream Diversion. 29 June 2020.</li> <li>• Golder. 2021a. B2B Gold Back River Project - Goose Property Area: Supplemental Hydrology and Fish Habitat Data Report. 2021 Open-Water Period.</li> <li>• WSP. 2023a. 2022 Rascal Stream West Field Summary and Fish Passage Characterization. 21 February 2023. Reference No. 21505757-129-TM-RevO.</li> <li>• WSP. 2023b. B2Gold Back River Project - Rascal Stream West Culvert Installation Construction Monitoring Report. Submitted to DFO on 18 December 2023.</li> </ul> <p>Appendix F, Rascal Stream West Crossing Construction Summary Report was provided on the nirb.ca website, but this report states <i>"The scope of WSP's services described in this report is limited to the civil and hydrotechnical engineering input and does not include structural engineering, environmental, or regulatory permitting aspects"</i>. This document does not provide the environmental construction monitoring of the culvert installation and is not helpful to assess compliance with this condition.</p> <p>Further, it would have been relevant to have reporting related to environmental construction monitoring for the clear-span bridge installed in 2018 (to review erosion and sediment control measures and success) and any subsequent hydrology and fish passage assessments other than the ones identified above. For</p>



	<p>example, a 2019 fish habitat study was completed at the clear span bridge to show that the bridge does not impede flow or fish passage. Further, annual visual inspections were completed in 2019 and 2020 during spring freshet, confirming minimal ice buildup.</p> <p>Also, are there any other plans to modify the flow soon that could modify compliance? If so, then it should remain partially compliant. For example, it does not appear that the fishway to divert flow from Rascal Stream East to Rascal Stream West has been constructed yet. What are the impacts on the flow? This is particularly of concern considering the hydrotechnical assessment that showed some areas as likely having high velocities that were too high for fish passage (once diverted).</p> <p>Also, the culverts in Rascal Creek were not installed in the winter ice period, as required, which led to site isolation requirements that likely temporarily impeded flow and fish passage. And maximum flows of 0.94 m/s have been identified at the watercourse crossing, but no assessment against Arctic Grayling swimming abilities was completed (based on readily available documentation).</p> <p>Finally, a planned fishway (diversion) has yet to be constructed and will also require monitoring to ensure compliance with this condition.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• We recommend that only relevant documents be listed in the compliance table for this condition within the Annual Report and that these documents be provided on the nirb.ca website with links.</li> <li>• We recommend that all completed and planned in-water structures that could affect fish passage be listed with references to reports to verify flow and fish passage.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>Based on monitoring to date, B2Gold Nunavut has rated itself as compliant with this condition. However, documentation is missing to assess this condition at all existing in-water structures. Further, planned in-water structures (e.g., fishway diversion) could affect compliance with this condition.</p>
<b>Importance</b>	High

## 1.22 KIA-NIRB-22

<b>Review Comment Number</b>	KIA-NIRB-22
<b>Subject/Topic</b>	Missing references to assess compliance with fish protection measures, PC Condition No. 24





<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025), Section 4.5.6</p> <ul style="list-style-type: none"> <li>• PC Condition No. 24</li> <li>• Rascal Stream West Culvert Installation Construction Monitoring Report (December 2023)</li> </ul>
<b>Summary</b>	<p>The condition includes B2Gold Nunavut using applicable DFO mitigation for constructing, operating, and maintaining watercourse crossings. Several references are mentioned, but they were not found online.</p>
<b>Detailed Review Comment</b>	<p>The condition includes B2Gold Nunavut using applicable DFO mitigation for constructing, operating and maintaining watercourse crossings. Several references are mentioned but were not found on the nirb.ca website. Also, some references, such as Appendix F (WSP 2024a, Rascal Stream West Crossing Construction Summary Report), do not appear relevant. This document only refers to the geotechnical aspects of culvert installation, not mitigation measures used to protect fish and fish habitat. Appendix G is also referenced (WSP 2024b Back River Project Rascal Stream West Arctic Grayling Monitoring-2024 Field Summary Report and Fish Passage Characterization), but this report provides field investigations of the weirs as well as fish captures and is not related to the implementation of mitigation measures and best management practices for watercourse crossings. Also, none of the annual reports are referenced.</p> <p>One relevant reference found on the nirb.ca website is the Rascal Stream West Culvert Installation Construction Monitoring Report (December 2023). This report provides the details of monitoring conducted during the installation of culverts on the main and secondary channels of Rascal Stream West. While there were a few issues, such as the timing of some of the works not respecting the least risk windows and emergency fish salvages, these were discussed with and apparently approved by DFO. Some of the reports that seem to be missing are the construction monitoring reports for the 14 weirs installed to control flows.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the relevant reference documents on the nirb.ca website with links to find them.</li> <li>• The proponent should remove non-relevant documents from the list of references.</li> <li>• The proponent should add the construction monitoring report related to installing the 14 weirs in Rascal Stream West.</li> </ul>
<b>Agree or Disagree with</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition. We find this condition partially compliant when considering that</p>



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<b>Compliance Statement</b>	some documentation evidence is missing and that future instream works are planned and have not been assessed yet (i.e., construction of the diversion fishway associated with the airstrip).
<b>Importance</b>	High

### 1.23 KIA-NIRB-23

<b>Review Comment Number</b>	KIA-NIRB-23
<b>Subject/Topic</b>	Missing references to assess the fish passage monitoring program at the culverts, PC Condition No. 24
<b>References</b>	2024 Back River Project Annual Report (April 4, 2025), Section 4.5.6 <ul style="list-style-type: none"> <li>PC Condition No. 24</li> </ul>
<b>Summary</b>	The condition includes a monitoring program to be developed and implemented by B2Gold Nunavut for the culverts and the operational and closure phases of these watercourse crossings. However, the documentation provided only with references to construction.
<b>Detailed Review Comment</b>	Several references are mentioned but were not found on nirb.ca. Also, several references in this annual report do not appear relevant, such as Appendix F (WSP 2024a; Rascal Stream West Crossing Construction Summary Report). This document only refers to the geotechnical aspects of culvert installation and not monitoring to be completed during the operational or closure phases. Appendix G is also referenced (WSP 2024b Back River Project Rascal Stream West Arctic Grayling Monitoring-2024 Field Summary Report and Fish Passage Characterization) and is relevant and available on the nirb.ca website. It does report some investigations related to the culverts. However, this report was completed in 2023. Is there no report for 2024? Further, it is impossible to determine the details of the monitoring program based on the readily available information. Also, it is unclear if any other culverts at the Project location require monitoring.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>The proponent should provide the relevant reference documents on the nirb.ca website with links to find them.</li> <li>The proponent should remove non-relevant documents from the reference list.</li> <li>The proponent should provide the monitoring program in one document.</li> <li>The proponent should add the schedule for ongoing monitoring at the culvert location and the 2024</li> </ul>



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	monitoring report (if required based on the monitoring program).
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, we find it to be partially compliant, considering that some documentation evidence is missing.
<b>Importance</b>	Moderate

#### 1.24 KIA-NIRB-24

<b>Review Comment Number</b>	KIA-NIRB-24
<b>Subject/Topic</b>	Wildlife Mitigation and Monitoring Program Plan availability
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>Back River Project Wildlife Mitigation and Monitoring Program Plan (WMMPP; Version 13)</li> </ul>
<b>Summary</b>	The 2024 Annual Report references Version 13 of the WMMPP published in October 2024. This document does not appear to be available on the NIRB project portal.
<b>Detailed Review Comment</b>	<p>The Annual Report states that the latest Wildlife Mitigation and Monitoring Program Plan is version 13, which is dated October 2024; however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13.</p> <p>It is not possible to evaluate compliance with this condition without the latest WMMPP iteration available (Version 13, published October 2024). This comment applies to all subsequent condition evaluations that reference or rely on the latest Version 13 of the WMMPP.</p>
<b>Recommendation/Request</b>	<p>The KIA requests that:</p> <ul style="list-style-type: none"> <li>The latest iteration of the WMMPP be made available on the NIRB website for review.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, we find it to be partially compliant, considering that some documentation evidence is missing.
<b>Importance</b>	Moderate

#### 1.25 KIA-NIRB-25

<b>Review Comment</b>	KIA-NIRB-25
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<b>Number</b>	
<b>Subject/Topic</b>	Caribou Mitigation Measures – July 26 to August 31
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025), Section 4.5.10</p> <ul style="list-style-type: none"> <li>• PC Condition No. 39</li> <li>• Back River Project Wildlife Mitigation and Monitoring Program Plan (WMMPP; Version 12 and 13)</li> <li>• Back River Project 2024 Annual Report; Appendix C 2024 Wildlife Mitigation and Monitoring Program Report</li> </ul>
<b>Summary</b>	This condition requires the proponent to “demonstrate consideration for the increased potential of caribou presence ... during the July 26 to August 31 period.” The 2024 Annual Report and Appendix C does not appear to describe how this was completed.
<b>Detailed Review Comment</b>	The 2024 Annual Report states, “In 2024, B2Gold Nunavut followed the mitigation measures listed in the WMMPP (Version 12, April 2023 and Version 13, October 2024)”. However, no evidence or report section is referenced that supports B2Gold’s conclusion that the increased potential of caribou presence was considered in the July 26 to August 31 period of 2024. The linkage between the 2024 Annual Report Appendix C content and this condition should be made clearer in the condition summary table.
<b>Recommendation/Request</b>	<ul style="list-style-type: none"> <li>• KIA requests that B2Gold provide cross-references and linkages between the 2024 Annual Report condition summary and the detailed description of activities in the 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C) to clarify exactly how this condition was met in 2024.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, we find it to be partially compliant, considering that some documentation evidence is missing.
<b>Importance</b>	Low

### 1.26 KIA-NIRB-26

<b>Review Comment Number</b>	KIA-NIRB-26
<b>Subject/Topic</b>	Missing information to assess compliance for the mitigation and monitoring of bird and bird habitat.
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025), Section 4.5.10



	<ul style="list-style-type: none"> <li>• Wildlife Mitigation and Monitoring Program Plan (Version 12), April 2023</li> <li>• Appendix C – 2024 Wildlife Mitigation and Monitoring Report, dated April 4, 2025</li> </ul>
<b>Summary</b>	The condition relates to the avoidance of species at risk. However, the latest plan is not readily available, and some information is missing to assess compliance fully.
<b>Detailed Review Comment</b>	<p>The Annual Report states that <i>“Specific measures for the protection and monitoring of birds and bird habitat are described within the Wildlife Mitigation and Monitoring Program Plan (Version 13), October 2024, in Sections 10, 11, 12, and 13”</i>, however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13.</p> <p>The condition states that mitigation and monitoring measures will be applied at all times throughout project operations to limit impacts to birds and bird habitat from specific project activities and infrastructure. The Plan does show proposed mitigation and monitoring throughout the different project phases for most of the valued components.</p> <p>The condition states that the plan will include mitigation and monitoring measures applied during periods of heightened sensitivity or alternative circumstances. The Plan does provide specific avoidance and mitigation measures for raptors, waterbirds, upland birds, seabirds and seabirds during sensitive periods (e.g., keeping a set distance, avoiding works during nesting periods).</p> <p>The condition states that adaptive management measures with specific triggers for intervention including but not limited to reduced or shutdown procedures for inclement weather during migration will be provided. The Plan does provide an adaptive management strategy with triggers. For example, the presence of raptors in the works area would trigger both monitoring and the installation of buffer zones to minimize disturbance of nesting birds.</p> <p>The condition also states that efforts will be made to incorporate Inuit’s (Qaujimaningit) to ensure the effective delivery of the WMMPP as related to bird and bird habitat protection. The Plan does state that <i>“efforts will be made to utilize local Kitikmeot Inuit or representatives of other aboriginal groups to act as wildlife monitors”</i> but the 2024 annual report (Appendix C – 2024 Wildlife Mitigation and Monitoring Report) does not explicitly</p>



	<p>indicate if and how Inuit were included within the annual program implementation (only the plan development).</p> <p>The condition states that “a bird mortality survey will be completed annually for five (5) years once the turbines are operational to confirm predictions. If predictions are confirmed, then the survey can be completed every three (3) years to ensure that predictions remain consistent”. However, the Plan states that monitoring of the wind turbines will be completed for a period of two years as per the recommendations of Environment Canada. It is unclear why the Plan does not match this condition.</p> <p>The condition states that the Plan will be submitted to NIRB within 60 days of issuance of Project Certificate 007, Amendment No. 1 and whenever the Proponent makes subsequent revisions to the WMMPP. It is unclear from the information provided whether these timelines were respected.</p> <p>The condition also states that “information regarding how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge and changes suggested by the Inuit Environmental Advisory Committee and the Caribou Technical Advisory Group have been incorporated into the Wildlife Mitigation and Monitoring Program Plan should be discussed in the Proponent's annual report.” There is a section in the annual report called “Project Requirements and Monitoring Objectives” which provides some details on how this information was included. However, it was noted that the reports and meetings that were included are all for the period of 2012 to 2015, which is quite dated. The report also states that “No new IQ (Inuit Qaujimajatuqangit) or TK (Traditional knowledge) was collected in 2024”. Is there no new information that could have affected Plan updates since 2015? For example, under Condition 55 of the annual report, the proponent states that changes to the Plan have been made due to review comments from the Kitikmeot Inuit Association (KIA) and Caribou Technical Advisory Group (CTAG) related to monitoring and species at risk.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <p>The proponent should provide the latest Wildlife Mitigation and Monitoring Program Plan (Version 13), dated October 2024 on the nirb.ca website with a link to the plan.</p> <ul style="list-style-type: none"> <li>• The proponent should provide details on if and how the Inuit (Qaujimaningit) were included in the plan's delivery during the 2024 field program.</li> <li>• The proponent should clarify why the monitoring frequency for wind turbine bird mortality monitoring is different between the conditions and the plan.</li> <li>• The proponent should provide details on the date of the original plan and subsequent versions and timelines for</li> </ul>





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	<p>submission to the NIRB.</p> <ul style="list-style-type: none"> <li>The proponent should provide any new IQ or TK collected since 2015 that affected the Plan updates since 2015.</li> <li>The proponent should clarify the reference list to include fill titles as well as acronyms, as the Plan (WMMPP) and the annual report (WMMP) have very similar acronyms which can lead to confusion.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess compliance fully, we find this condition partially compliant.
<b>Importance</b>	Moderate

### 1.27 KIA-NIRB-27

<b>Review Comment Number</b>	KIA-NIRB-27
<b>Subject/Topic</b>	Avoidance measures for species at risk for some bird groups appears to be missing.
<b>References</b>	<p>2024 Back River Project Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>PC Condition No. 54</li> <li>Wildlife Mitigation and Monitoring Program Plan (Version 12), April 2023</li> <li>Appendix C – 2024 Wildlife Mitigation and Monitoring Report, dated April 4, 2025</li> </ul>
<b>Summary</b>	The condition relates to the avoidance of species at risk with buffers and setbacks, but this information appears to only be provided for waterbirds and should likely include the other bird groups (i.e., raptors, upland birds, seabirds and seaducks) to be fully compliant.
<b>Detailed Review Comment</b>	<p>The Annual Report states that the latest Wildlife Mitigation and Monitoring Program Plan is version 13, which is dated October 2024; however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13.</p> <p>The condition states that primary mitigation for any species at risk or their nests and eggs that are encountered during project activities or monitoring programs should be avoidance and the establishment of species-specific nest setback distances. While the Plan discusses raptors, waterbirds, upland birds, seabirds and seaducks, this mitigation is only discussed in the waterbirds</p>



	<p>section with the following statement “<i>if Species at Risk or their nests and eggs are encountered during wind turbine activities or monitoring programs near the wind turbines, the primary mitigation measure will be avoidance and a zone of avoidance provided, as per TC # 54.</i>” It is unclear why this mitigation is not equally reported for the other bird species.</p> <p>The condition also states that information regarding the Proponent's fulfillment of this Condition should be included in the annual report to the NIRB. This condition was fulfilled in 2024 as the annual report states that “No nests belonging to avian species at risk were identified in 2024.”</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the latest Wildlife Mitigation and Monitoring Program Plan (Version 13), dated October 2024 on the nirb.ca website with a link to the plan.</li> <li>• The proponent should provide details about the primary mitigation for raptors, upland birds, seabirds and seaducks within the Plan or provide rationale why these were excluded and regulatory approval.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess compliance fully, we find this condition partially compliant.</p>
<b>Importance</b>	<p>Low</p>

### 1.28 KIA-NIRB-28

<b>Review Comment Number</b>	KIA-NIRB-28
<b>Subject/Topic</b>	Pre-clearing bird nesting surveys.
<b>References</b>	<p>2024 Back River Project Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 54</li> <li>• Wildlife Mitigation and Monitoring Program Plan (Version 12), April 2023</li> <li>• Appendix C – 2024 Wildlife Mitigation and Monitoring Report, dated April 4, 2025</li> </ul>
<b>Summary</b>	<p>The condition relates to the pre-clearing bird nesting surveys, which are described in the Wildlife Mitigation and Monitoring Program Plan and the 2024 Wildlife Mitigation and Monitoring Report and appear partially compliant due to missing information.</p>
<b>Detailed Review</b>	<p>The Annual Report states that the latest Wildlife Mitigation and</p>



<p><b>Comment</b></p>	<p>Monitoring Program Plan is version 13, which is dated October 2024; however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13.</p> <p>The condition states that the Proponent should schedule required ground- disturbance activities (e.g. clearing) prior to the seasonal return of migratory birds, as feasible, and install nesting deterrents (e.g. flagging) to discourage birds from nesting in areas likely to be disturbed by construction/clearing activities. If clearing is to occur during the nesting season, a nest survey should take place to identify nests and establish appropriate setbacks to ensure nests remain undisturbed until the young have fledged or left the nest. Pre-clearing nest surveys should be conducted less than 14 days prior to land clearing activities. The Plan provides the details of the pre-clearing bird surveys that will be conducted for the different bird groups, including:</p> <ul style="list-style-type: none"> <li>• During ground clearing, if it is not possible to avoid the nesting period, then conduct pre-construction surveys for nests.</li> <li>• If a nest is found during pre-clearing surveys within the slated Project footprint, then the Environment Manager will set up a buffer which varies in distance based on the bird group.</li> <li>• The nest will be monitored, and the breeding success will be reported.</li> <li>• If construction is planned in waterbird habitat (lake margins and wetlands) or upland breeding bird habitat during the nesting period, then B2B Gold will conduct pre-construction surveys for nests within 7 days prior to clearing. Surveys will be repeated if clearing activities do not occur within 7 days of the original survey.</li> </ul> <p>These proposed monitoring and mitigation measures align with the condition.</p> <p>The condition also states that the results of surveys conducted by the Proponent in fulfillment of this condition should be included in the Proponent's annual report to the NIRB. Results of the pre-clearing bird survey are provided the Appendix C – 2024 Wildlife Mitigation and Monitoring Report and state:</p> <ul style="list-style-type: none"> <li>• During the breeding season, 18 pre-clearing surveys for birds (including raptors and migratory birds) were completed at the Goose site between May 20 and August 10, 2024.</li> <li>• In all cases, surveys were conducted the same day as, or</li> </ul>
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	<p>one day prior to, ground clearing.</p> <ul style="list-style-type: none"> <li>• One active Willow Ptarmigan nest (<i>Lagopus lagopus</i>) was identified during pre-clearing surveys at the Main Camp Pad Expansion on July 1, 2024. A 100 m setback buffer was established around the nest on July 1, 2024, and was decreased to 50 m on July 3, 2024. The nest was monitored until it was deemed inactive on July 5, 2024.</li> <li>• No raptor nests were identified during pre-clearing surveys in 2024, and therefore no mitigation or buffers were required.</li> <li>• Six additional nests were incidentally observed at the Mine in 2024. Setback buffers were applied to all active nests.</li> </ul> <p>This information appears to satisfy the requirements of this condition. However, it is noted that the condition also states that clearing activities should ideally take place before the bird nesting season and that nesting deterrents (e.g. flagging) should be installed to discourage birds from nesting in areas likely to be disturbed by construction/clearing activities. It is unclear from the information provided how many nesting surveys were completed before the nesting season versus during, and what deterrence methods were used to keep birds out of the area for nesting surveys completed before the nesting season.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide details on any clearing completed before the nesting season and any deterrence used to keep birds out of the area.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess compliance fully, we find this condition partially compliant.</p>
<b>Importance of Issue</b>	<p>Low</p>



### 1.29 KIA-NIRB-29

<b>Review Comment Number</b>	KIA-NIRB-29
<b>Subject/Topic</b>	Minimum aircraft cruising altitudes to minimize wildlife disturbance., PC Condition No. 61
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 61</li> <li>• Wildlife Mitigation and Monitoring Program Plan (Version 12), April 2023</li> </ul>
<b>Summary</b>	The condition relates to minimum cruising altitudes for fixed-wing aircrafts and helicopters to minimize disturbance of caribou, muskox and migratory birds. This condition is likely compliant based on the information provided and the requirements of Condition #61.
<b>Detailed Review Comment</b>	<p>The Annual Report states that the latest Wildlife Mitigation and Monitoring Program Plan is version 13, which is dated October 2024; however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13. Further, the document titled “Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations (June 2024, ENVIRO-03)” was not readily available online and could not be verified.</p> <p>The condition states the proponent will ensure that project aircraft maintain sufficient cruising altitudes to avoid disturbance to migratory birds, caribou and muskoxen that may be encountered during aircraft flights to the George property and other exploration areas (includes Goose property), as well as during the transfer of employees between project facilities. The Plan provides fixed-wing aircraft and helicopter management details under the sections for caribou, muskox and migratory birds as well as others such as Grizzly Bear. The Plan indicates that:</p> <ul style="list-style-type: none"> <li>• Fixed-wing aircraft (migratory birds, caribou and muskoxen): aircraft will remain above 610 m local ground level at all times, except when landing or taking off from the Marine Laydown Area (MLA) or the Goose Airstrip.</li> <li>• Helicopters (Caribou): During calving, post-calving, and early summer (June 5 - July 31), large groups of caribou (more than 250) will be avoided by 610 m vertically or 4 km horizontally. The elevation of 610 m is taken from the</li> </ul>



	<p>draft Nunavut Land Use Plan (2014) for the operation of aircraft in calving and post-calving seasons/areas.</p> <ul style="list-style-type: none"> <li>• Helicopter (raptor): Pilots will avoid raptor nests by at least 650 m.</li> <li>• Fixed wing (waterbird): Reduce disturbance to colony-nesting birds and important staging areas during sensitive periods by maintaining an aircraft flight altitude of at least 650 m during horizontal (point to point) flights.</li> </ul> <p>The Annual Report just states that “During 2024, both fixed-wing and helicopter pilots followed guidelines set out in the WMMPP”. It is unclear how the pilots were informed of the guidelines and how they used their equipment to implement these guidelines. Further, it is unclear if the results will still be provided annually or whether longer-term arrangements with contractors have been established and results will be presented every two (2) years or whenever there is a change or addition to the contractor.</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the document “Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations, dated June 2024” on the nirb.ca website and provide the link so it is readily available.</li> <li>• The proponent should specify how the pilots were informed of the guidelines and how they used their equipment to implement these guidelines.</li> <li>• The proponent should clarify if the results will still be provided annually or whether longer-term arrangements with contractors have been established and results will be presented every two (2) years or whenever there is a change or addition to the contractor.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	<p>B2Gold Nunavut has rated itself as compliant with this condition and we agree based on the fact that the required information is provide in the document that we could find and that daily logs or record of flights and cruising altitudes are to be provided as per Condition #61.</p>
<b>Importance</b>	Low

### 1.30 KIA-NIRB-30

<b>Review Comment Number</b>	KIA-NIRB-30
<b>Subject/Topic</b>	Daily logs for aircraft cruising altitudes to minimize wildlife disturbance.
<b>References</b>	<ul style="list-style-type: none"> <li>• Wildlife Mitigation and Monitoring Program Plan (Version 12), April 2023</li> </ul>





<b>Summary</b>	The condition relates to record keeping for minimum cruising altitudes for fixed-wing aircraft and helicopters to minimize wildlife disturbance. This condition is partially compliant until the missing information can be provided.
<b>Detailed Review Comment</b>	<p>The Annual Report states that the latest Wildlife Mitigation and Monitoring Program Plan is version 13, which is dated October 2024; however, that plan is not provided in the Annual Report appendices and was not readily available on the nirb.ca website. The most recent version of the Plan that was found online was version 12, dated April 2023. This version was used to verify conditions on content, assuming it is quite close to the content of version 13. Further, the document titled <i>“Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations (June 2024, ENVIRO-03)”</i> was not readily available online and could not be verified.</p> <p>The condition states the proponent will ensure that pilots are informed of minimum cruising altitude guidelines and that a daily log or record of flight paths and cruising altitudes for project aircraft is maintained to monitor adherence and to follow up on complaints. However, the Plan provides little detail on this requirement except repetitive general information from other conditions; thus, it is difficult to tease out information relevant to this condition. It is likely that this information was provided in the Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations, but this document could not be reviewed.</p> <p>The Annual Report states that “Annually from 2019 to 2024 the Fixed Wing and Helicopter Operations SOP (June 2024) was delivered to fixed wing and helicopter companies working on site” and <i>“Mitigation and monitoring were effective. No wildlife incidents with aircraft were recorded.”</i> Few details are provided to verify this condition.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• The proponent should provide the document “Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations, dated June 2024” on the nirb.ca website and provide the link so it is readily available.</li> <li>• The proponent should provide additional details in the Plan on how the daily log or record of flight paths and cruising altitudes were kept by the different aircraft contractors.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess



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	compliance fully, we find this condition partially compliant.
<b>Importance</b>	Low

### 1.31 KIA-NIRB-31

<b>Review Comment Number</b>	KIA-NIRB-31
<b>Subject/Topic</b>	Marine Shipping Setbacks
<b>References</b>	<ul style="list-style-type: none"> <li>• Back River Project 2024 Annual Report, Section 4.5.13; Appendix C 2024 Wildlife Mitigation and Monitoring Program Report; Section 8.2.2, Figure 8.2-2</li> <li>• Standard Operating Procedure – Marine Shipping Wildlife Mitigation and Monitoring. Version 2.0</li> <li>• PC Condition No. 64</li> <li>• PC Condition No. 65</li> </ul>
<b>Summary</b>	Shipping tracks shown in the Annual Report appear to intersect with sensitive habitat setback distances around Prince Leopold Island.
<b>Detailed Review Comment</b>	<p>Figure 8.2-2 of Appendix C of the Annual Report shows two vessel tracks (MV Marcellin Desgagnes and MV Suomigracht) intersecting the shipping setback distance buffer around Prince Leopold Island. Section 2.2 of the SOP for Marine Shipping Wildlife Mitigation and Monitoring Version 2.0 notes that, except where the safety of the ship is a concern, ships will adhere to a setback distance of 30 km from Prince Leopold Island. This encroachment does not appear to be noted in the text of Appendix C. Furthermore, in Figure 8.2-2, vessel tracks appear to intersect land at multiple locations, which suggests inaccuracy of the track mapping. This inaccuracy limits the usefulness of the maps to evaluate whether ships adhered to required setbacks.</p> <p>The latest available version of the SOP for Marine Shipping Wildlife Mitigation and Monitoring that could be found on the NIRB document repository at the time of review is Version 2.0, dated September 30, 2019. Appendix C of the Annual Report cites a July 2024 iteration of this document. In the absence of the latest version of the SOP, verification of the applicability of the setback distances is not possible.</p>
<b>Recommendation/Request</b>	<p>The KIA requests that:</p> <ul style="list-style-type: none"> <li>• B2Gold verify whether any vessels passed within the shipping setback buffer around Prince Leopold Island in 2024. If these vessels did encroach on setback areas, then corrective action should be taken for future shipping activity, including mandating that setbacks be adhered to.</li> </ul>



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	<ul style="list-style-type: none"> <li>The latest version of the Standard Operating Procedure – Marine Shipping Wildlife Mitigation and Monitoring be provided via the NIRB website to allow for verification of the setback distances.</li> </ul>
<b>Agree or Disagree with Compliance Statement</b>	B2Gold Nunavut has rated itself as compliant with this condition. However, considering the missing information to assess compliance fully, we find this condition partially compliant.
<b>Importance</b>	Moderate

### 1.32 KIA-NIRB-32

<b>Review Comment Number</b>	KIA-NIRB-32
<b>Subject/Topic</b>	Adding cross references to plans and supporting documents to each term and condition throughout the annual report (example for Air Quality, PC Condition No. 1 provided here).
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>Term or Condition sections throughout the Annual Report</li> </ul> <p>Air Quality Monitoring and Management Plan (July 2019)</p> <p>Other relevant Management, Monitoring plans or other supporting documents for each Term or Condition throughout the report</p>
<b>Summary</b>	As a suggestion, it would be helpful if the Term or Condition sections reference specific sections of the Air Quality Monitoring and Management Plan (AQMMP) or other plans to clearly show where the supporting documents for the Term or Condition can be located. Although this is suggested here for the Air Quality- Project Certificate Condition No. 1, this should be provided throughout the report for each Term or Condition for clarity.
<b>Detailed Review Comment</b>	<p>The lettered items that define the key information to be included in the AQMMP should be followed by a reference to the section of the AQMMP where this specific information can be found. This would clarify that the term or condition has been met within the management and monitoring plan. Likewise, some terms or conditions are covered in other documents, which should be noted for each item where this is the case. For instance, the description of lichen surveys (item d) is not covered in the AQMMP, but in the Vegetation Monitoring Program. The Vegetation Monitoring Program, in this case, should be referenced in this section and the 2024 Annual Report PC Condition No. 1 Reference section for clarity and completeness.</p> <p>Providing the specific references for each Term or Condition throughout the Annual Report is recommended and will speed up the review process.</p>



<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please add AQMMP section references to each Term or Condition throughout the report for clarity.</li> <li>• Please include a reference for the Vegetation Monitoring Program for the description of lichen surveys (d) and this program in the 2024 Annual Report PC Condition No. 1 Reference section.</li> </ul>
<b>Importance</b>	Low

### 1.33 KIA-NIRB-33

<b>Review Comment Number</b>	KIA-NIRB-33
<b>Subject/Topic</b>	Monthly Windrose charts
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• Figures 4.5-6 and 4.5-7</li> </ul>
<b>Summary</b>	Monthly windrose charts are missing. These monthly charts provide important information that will help in evaluating the sampling locations.
<b>Detailed Review Comment</b>	Monthly wind rose charts are missing. These charts provide important information for evaluating the suitability of sampling locations. The 2024 report includes only the annual wind rose. However, access to monthly wind rose charts would allow for a more accurate assessment of the selected monitoring station sites.
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please add monthly windrose charts to the report.</li> </ul>
<b>Importance</b>	High

### 1.34 KIA-NIRB-34

<b>Review Comment Number</b>	KIA-NIRB-34
<b>Subject/Topic</b>	Sampling locations
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 1</li> <li>• PC Condition No. 8</li> </ul>
<b>Summary</b>	The sampling locations at Goose Property area are only located in SE direction of pad.
<b>Detailed Review Comment</b>	For the Goose Area sampling locations, all sites (excluding the background location) are situated southeast of the pad. However,



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	according to the wind rose for the Goose Area (page 4-33), there are significant winds from other directions as well. Therefore, focusing on a single wind direction may not accurately reflect the pollution status in the area.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>Please clarify how the selected sampling locations are expected to represent the overall pollution status in the project area, given the presence of multiple significant wind directions.</li> </ul>
<b>Importance</b>	Moderate

### 1.35 KIA-NIRB-35

<b>Review Comment Number</b>	KIA-NIRB-35
<b>Subject/Topic</b>	Stack Monitoring, PC Condition No.5
<b>References</b>	B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025) <ul style="list-style-type: none"> <li>PC Condition 5</li> </ul> Incinerator Management Plan (June 2020)
<b>Summary</b>	Comparison of incinerator stack measurements with those used in the air dispersion modeling presented in the Environmental Impact Statement (EIS).
<b>Detailed Review Comment</b>	On page 4-22, for stack measurements it is mentioned that: "... and a discussion of the results, including comparison with the Canada Wide Standards for Dioxins and Furans (CCME 2000a) and the Canada Wide Standards for Mercury (CCME 2000b)." It is not clear if the incinerator stack was considered as a pollution source in the air dispersion modeling study or not.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>If this incinerator stack was included in the air dispersion modeling, please compare the measured concentrations with the emission rates used in the modeling study. If it was not considered, please clarify the rationale for its exclusion.</li> </ul>
<b>Importance</b>	Moderate

### 1.36 KIA-NIRB-36

<b>Review Comment Number</b>	KIA-NIRB-36
<b>Subject/Topic</b>	Air Quality sites excluded from sampling/monitoring, PC Condition



### 1.37 KIA-NIRB-37

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	<ul style="list-style-type: none"> <li>PC Condition No. 1</li> </ul> <p>BACK RIVER PROJECT - Air Quality Monitoring and Management Plan (July 2019)</p> <ul style="list-style-type: none"> <li>Section 7.1.2 Sampling locations</li> </ul>
<b>Summary</b>	More details are needed regarding the criteria used to select station locations.
<b>Detailed Review Comment</b>	In the 2024 report (page 4-11), it is mentioned that in the updated 2019 report, descriptions of air monitoring stations are provided. However, in the 2019 report, it is not clear how the selected stations are positioned relative to predictions in the EIS report. Additionally, there is a significant discrepancy between the sampling locations suggested in 2019 report vs. 2024 report (page 4-13 in 2014 report vs. page 11 in 2019 report).
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>Please provide a map for the 2024 report showing sampling locations vs. the areas predicted to have the highest concentration of pollutions the EIS report.</li> <li>Please discuss why the sampling locations are significantly different from what was suggested in the 2019 report.</li> </ul>
<b>Importance</b>	High

### 1.38 KIA-NIRB-38

<b>Review Comment Number</b>	KIA-NIRB-38
<b>Subject/Topic</b>	Thermal monitoring plan reference needed
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>PC Condition No. 11</li> <li>PC Condition No. 12</li> </ul> <p>Thermal Monitoring Plan (in preparation)</p>
<b>Summary</b>	The Thermal Monitoring Plan (in preparation) should be included in the 2024 Annual Report PC Condition No. 11 and PC Condition No. 12 Reference section.
<b>Detailed Review Comment</b>	The Methods section of PC Condition No. 11 states, “B2Gold Nunavut has contracted SRK Consulting Inc. to prepare a thermal monitoring plan. At the time of this submission, a draft Thermal Monitoring Plan has been submitted for B2 Gold Nunavut review. The scope of the aforementioned Thermal monitoring Plan includes but is not limited to further permafrost mapping to document permafrost temperature, thickness of seasonal thaw, and amount of ground ice in the Project Development Area. This



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	<p>information will be made available in the future to assist in the detailed design of project infrastructure.”</p> <p>Similarly, the Methods section of PC Condition No.12 states,” B2Gold Nunavut has contracted SRK Consulting Inc. to prepare a Thermal Monitoring Plan. At the time of this submission a draft Thermal Monitoring Plan has been submitted for B2Gold Nunavut Review. The scope of the aforementioned Thermal Monitoring Plan includes but is not limited to the following project infrastructure, roads, waste rock stockpiles, trails, and quarries. Should permafrost degradation be observed, the Proponent shall report on measures implemented to restore and promote permafrost integrity. Remediation measures as recommended through ongoing analysis of the Thermal Monitoring Plan shall be implemented to restore and promote permafrost integrity. Information regarding monitoring results and any updates to mitigation measures shall be provided every two (2) years in the Proponent's annual report to the Nunavut Impact Review Board.”</p> <p>While this plan is in preparation, the reporting requirement for the permafrost mapping and scope of the plan should be described in a terrestrial environmental monitoring plan, or a reference to the Thermal Monitoring Plan draft should be provided in the 2024 Annual Report PC Condition No. 11 and PC Condition No. 12 Reference section. This would provide a timeline for the preparation and submission of the Plan for clarity on meeting the requirements for submission to the NIRB registry.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please include the Thermal Monitoring Plan (in preparation) in the 2024 Annual Report PC Condition No. 11 and PC Condition No. 12 Reference section.</li> </ul>
<b>Importance</b>	Low

### 1.39 KIA-NIRB-39

<b>Review Comment Number</b>	KIA-NIRB-39
<b>Subject/Topic</b>	Missing information on management plans for sensitive landforms and geotechnical engineer inspection of major earthworks, PC Condition No.13
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>• PC Condition No. 13</li> </ul>
<b>Summary</b>	There is ambiguous language around the plans that include investigations, mitigation and monitoring measures for sensitive landforms. This should be clarified with reference to specific plans



	that include this information. Annual inspections of major earthworks are to be completed by a geotechnical engineer. It is unclear if these inspections have taken place previously.
<b>Detailed Review Comment</b>	<p>The PC Condition No. 13 Term or Condition section of the 2024 Annual Report states <i>"B2Gold Nunavut shall undertake additional geotechnical investigations as required to identify sensitive landforms, modify engineering design for project infrastructure (e.g., tailings storage facilities, waste rock piles and landfill), and develop and implement mitigation and monitoring measures to prevent or minimize the impacts of the Project's activities and infrastructure on sensitive landforms. Plans for the investigations, mitigation, and monitoring measures are to be included within appropriate management plans."</i></p> <p>Please specify the "appropriate management plan" that the plans for the investigations, mitigation, and monitoring measures are to be included in as this language is ambiguous. Mitigation and monitoring must have already taken place prior to the beginning of project construction during the planning phase. Where are the reports located? Please clarify.</p> <p>In the Next Steps section of PC Condition No. 13 of the 2024 Annual Report states that "B2Gold Nunavut is required to have a geotechnical engineer complete an annual inspection of all major earthworks. The inspection must be conducted in accordance with the Canadian Dam Safety Guidelines where applicable. This is a requirement of the Back River Project Type A Water Licence 2AM-BRP1831 (Part I, Item 10)."</p> <p>Please clarify if this inspection has been previously completed, and if so, provide the results of the inspection or provide a date when this inspection will be performed.</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please clarify which management plans include the plans for the investigations, mitigation and monitoring measures to reduce impacts on sensitive landforms can be found.</li> <li>• Please clarify where reports are located for monitoring sensitive landforms.</li> <li>• Please clarify if any annual inspections of major earthworks by a geotechnical engineer have been completed.</li> </ul>
<b>Importance</b>	Low

#### 1.40 KIA-NIRB-40

<b>Review Comment Number</b>	KIA-NIRB-40
<b>Subject/Topic</b>	Missing information on interim closure and reclamation plan, PC



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	Condition No. 15
<b>References</b>	<p>B2B Gold, Back River Project, 2024 Annual Report (April 4, 2025)</p> <ul style="list-style-type: none"> <li>PC Condition No. 15</li> </ul> <p>Back River Project Interim Closure and Reclamation Plan ICRP (July 2021)</p> <p>B2B Gold FEIS</p>
<b>Summary</b>	<p>Information for triggers for the application of adaptive management are currently not included in the Back River Project Interim Closure and Reclamation Plan ICRP (July 2021). No details on the collection of Qaujimagatuqangit or Traditional Knowledge to inform closure plans and the design of the project components were found in the ICRP; thus, this should be included in the Interim Closure and Reclamation Plan ICRP (July 2021) or the specific reference to where this information can be found (B2B Gold's FEIS). If this information was not included in the report due to data sensitivity shared by the IQ/TK holders, this should be stated.</p>
<b>Detailed Review Comment</b>	<p>The Term or Condition for PC Condition No. 15 in the 2024 Annual Report states "The Proponent shall have in place a plan for the progressive reclamation of project components, areas, and infrastructure throughout the life of the Project. The plan shall detail:</p> <ol style="list-style-type: none"> <li>1. projected timelines for the reclamation of project features, methodologies for undertaking such activities, and monitoring measures to ensure the effectiveness of reclamation methods employed;</li> <li>2. specific measures for adaptive management and triggers for their application, should monitoring results reveal trends that could affect the reclamation and closure objectives; and,</li> <li>3. how Inuit Qaujimagatuqangit and Traditional Knowledge was collected and used to inform closure plans and the design of project components." <p>The Back River Project Interim Closure and Reclamation Plan ICRP (July 2021) does not contain explicit triggers for applying adaptive management, as stated in the second condition of PC Condition No. 15. Information regarding specific triggers should be added to this plan.</p> <p>The ICRP did not provide details on the collection of Qaujimagatuqangit or Traditional Knowledge to inform closure plans and the design of the project components. However, a line in the ICRP indicated that this is outlined in B2B Gold's FEIS; thus, it should be referenced in this condition.</p> </li></ol>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>Please add specific triggers for the application of adaptive management to the ICRC (July 2021)</li> </ul>



	<ul style="list-style-type: none"> <li>Please provide the reference for B2B Gold's FEIS in the reference section of PC Condition No. 15 in the 2024 Annual Report.</li> </ul>
<b>Importance</b>	Moderate

#### 1.41 KIA-NIRB-41

<b>Review Comment Number</b>	KIA-NIRB-41
<b>Subject/Topic</b>	Vegetation species detected during monitoring and baseline
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	The results claim that similar numbers of species were detected in 2021 and 2024 monitoring; however, the species detected during 2021 monitoring and baseline data collection are not provided.
<b>Detailed Review Comment</b>	Section 5.1 of Appendix H states that “A total of 24 non-vascular plants (6 bryophytes and 18 lichens) were identified during 2024 field surveys. This is very similar to 2021 results where 36 vascular plants and 24 non-vascular (5 bryophytes and 19 lichens) were observed.” Appendix A provides the species detected in 2024, but not 2021. In order to detect any potential changes in the vegetation community, the species detected in each year of monitoring should be reported for comparison to the baseline.
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>Please include the species detected in 2021 and at baseline, perhaps by updating the table in Appendix A to include all three years of monitoring/baseline data collection and whether species were detected each year.</li> </ul>
<b>Importance</b>	Moderate

#### 1.42 KIA-NIRB-42

<b>Review Comment Number</b>	KIA-NIRB-42
<b>Subject/Topic</b>	Justification needed to conclude that dusting is not affecting vegetation height and surface substrate differences are natural
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	It is unclear how the authors came to the conclusions that dusting is not impacting vegetation height and that substrate variation is natural.
<b>Detailed Review Comment</b>	In Section 5.1, it says “Distance from the PDA and the associated potential influence of dust deposition do not appear to affect



	<p>vegetation height at this time in the Project's development." What is this claim based on? Was an analysis run to compare the vegetation heights among the different distances from PDAs? Were vegetation heights compared to the baseline, or only to each other across distances from PDAs?</p> <p>Under Table 6, it says "Overall, differences in surface substrate with increasing distance from the PDA appear minor and likely due to natural variability between plots." How was this concluded? Do the results from 2024 align with baseline results in terms of natural variability among plots? Was an analysis done to look for trends in surface substrate with distance from the PDA?</p>
<b>Recommendation/Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please provide justification / rationale for the conclusion that dusting is not impacting vegetation height</li> <li>• Please provide the justification / rationale for the conclusion that surface substrate differences are likely due to natural variability</li> </ul>
<b>Importance</b>	Low

#### 1.43 KIA-NIRB-43

<b>Review Comment Number</b>	KIA-NIRB-43
<b>Subject/Topic</b>	Species richness data need sample sizes clearly reported
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	The species richness data need to be provided with the caveat that sample sizes varied among the distance categories
<b>Detailed Review Comment</b>	<p>In Table 7 and the text that follows on page 16, total species richness numbers are provided for each distance category from the PDAs (0, 150, 500 m, 1, 5, 10-20 km). However, as reported in Table 2, the sample sizes among these distance categories are not equal. Zero m has 11 plots (6 in Goose and 5 in MLA), 150 m has 9 plots (5 in Goose and 4 in MLA), while the other categories have 5 plots each (all in Goose).</p> <p>The way the final row of Table 7 is presented (which sums across Goose and MLA), it looks like there was higher species richness closer to the PDAs. However, this may be attributable to the increased number of plots at these distance categories, and the fact that these 0 and 150 m categories included plots at the MLA which is in a different location and may naturally have different species present that increase this total.</p> <p>The report also states: "When looking at the total number of species observed, the highest species diversity of 51 was observed</p>





	at 150 m from the PDAs and the lowest of 26 species was observed at 10 to 20 km from the PDA at the Goose Property.” This may also be misleading, as the sample sizes differ.
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please update Table 7 to include the sample sizes (e.g., as a separate row above the Total or in brackets after each total [n=X plots])</li> <li>• Please update the statement noted above to indicate that the variation in sample sizes of plots is likely impacting these calculations of species richness and may contribute to the higher values closer to the PDAs</li> </ul>
<b>Importance</b>	Moderate

#### 1.44 KIA-NIRB-44

<b>Review Comment Number</b>	KIA-NIRB-44
<b>Subject/Topic</b>	Total abundance row needs clarification
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	Clarification needed on how total row in Table 8 was calculated
<b>Detailed Review Comment</b>	Table 8 presents abundance data as mean plant species cover (%). As these data are percentages, it is unclear how the total was calculated and what it represents.
<b>Recommendation/ Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please clarify how the total abundances were calculated</li> </ul>
<b>Importance</b>	Low

#### 1.45 KIA-NIRB-45

<b>Review Comment Number</b>	KIA-NIRB-45
<b>Subject/Topic</b>	Plant abundance is percent cover, not species richness
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	Results of plant abundance are described as numbers of species but should be percent cover based on Table 8.
<b>Detailed Review Comment</b>	The text under Table 8 on page 18 requires clarification. The first sentence refers to vascular plant richness – is this referring to Table 8 or the richness data presented in Table 7? If Table 8, this statement should be discussing plant abundance, which is not the same as species richness. Abundance as reported in Table 8 refers to percent cover in the monitoring plots. If this sentence refers to



	<p>Table 7 results, it should be moved to be under Table 7.</p> <p>The second sentence reads “The highest abundance of vascular plants (25) was seen at the vegetation plots at 0 m from the PDA at the MLA, while the highest number of non-vascular species (16) was observed at the vegetation plots at 500 m from the PDA at the Goose Property”. This appears to be a misinterpretation of the results in Table 8. The highest value of vascular plants of 25 should mean that 25% vascular plant cover was observed – not that 25 species were observed. The same goes for 16% plant cover of non-vascular plants being the highest (not 16 species). See the footnote under Table 8 for the definition of abundance as reported in these data.</p> <p>The final sentence of this paragraph refers to 2021 results, which are reported again as numbers of species but should be percent cover (see Table D-4 in Appendix D of this Appendix H; footnote indicates percent cover).</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>Please clarify the three sentences noted above to indicate that abundance results are percent cover, not numbers of species</li> </ul>
<b>Importance</b>	Moderate

#### 1.46 KIA-NIRB-46

<b>Review Comment Number</b>	KIA-NIRB-46
<b>Subject/Topic</b>	How ‘elevated’ metals was determined is unclear
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	Clarification needed on how metal levels were determined to be elevated in lichen samples.
<b>Detailed Review Comment</b>	<p>In Section 5.3 on lichen monitoring, a summary of “Metals with elevated concentrations at 0 m from the PDAs that may be Project-related” is provided on page 21 (second paragraph). What thresholds or quantifications were used to determine which metals were classified as elevated?</p> <p>As well, certain metals were noted as having “mean concentrations in lichen higher in 2024 compared to 2021, regardless of distance from the PDAs”. Why were these only compared to 2021 and not the baseline?</p> <p>Is this classification based on comparing 2024 results to 2021 results, or to the baseline (or both)? Upon examining the graphs provided in Appendix G, it is unclear how metals were chosen to be classified as elevated. Should they be classified as elevated if they</p>



	<p>are statistically significantly higher in 2024 than the baseline (e.g., error bar does not overlap baseline threshold)? For metals that do not have a baseline, if 2024 levels are significantly higher than 2021 levels (e.g., for boron)– should they then be considered elevated as well? Is there a comparison across the different distances from PDAs that is included in the calculation for determining which metals are elevated at 0 m?</p> <p>For example, it is unclear why lead is listed as elevated at 0 m at Goose Property based on the graph; 2024 levels are very close to baseline. 2021 levels are higher, but the error bar is very large and overlaps the baseline.</p> <p>As another example, manganese is listed as elevated at 0 m at the Goose property, but the graph appears elevated in 2024 (above baseline and 2021) across all distances (not just 0 m). How was it determined to be higher at 0 m than other distances?</p> <p>As well, nickel at MLA appears elevated above the baseline across all distances.</p> <p>Potassium at Goose property appears elevated above the baseline in both 2021 and 2024 but is not noted as elevated across all distances in the results.</p> <p>Thallium at MLA is below its baseline but reported as elevated in the results.</p> <p>Vanadium at MLA at 0 m is overlapping the baseline (error bar) but reported as elevated in the results. How was the significance calculated?</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please clarify the way in which ‘elevated’ was quantified and calculated for metal concentrations in lichens.</li> <li>• Please ensure the lists of metals that are elevated at 0 m and elevated across all sites are accurate.</li> </ul>
<b>Importance</b>	High

#### 1.47 KIA-NIRB-47

<b>Review Comment Number</b>	KIA-NIRB-47
<b>Subject/Topic</b>	Justification for conclusion of non-project-related elevated metals
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	Further justification is needed for determining that elevated metals are not due to the project.
<b>Detailed Review Comment</b>	In Section 5.3 on lichen monitoring, certain metals were noted as <i>having “mean concentrations in lichen higher in 2024 compared to 2021, regardless of distance from the PDAs”</i> . The report then states



	<p>that “The reason for these higher concentrations in 2024 is unknown but it is unlikely that they are Project-related given that concentrations were similar and did not decline with distance from the PDAs.”</p> <p>Further justification is needed to dismiss the idea that these elevated metals may have project-related effects. At what distance from the PDA are effects expected to stop? I.e., which of the sites are considered control sites? Is there evidence in the literature regarding the distance that mine impacts may spread and impact lichen metal concentrations? Do you have other ideas of factors that may be influencing metal concentrations and causing these elevated levels in 2024?</p>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please provide further clarification and justification for the conclusion that these elevated metals are not due to the project.</li> </ul>
<b>Importance</b>	Moderate

#### 1.48 KIA-NIRB-48

<b>Review Comment Number</b>	KIA-NIRB-48
<b>Subject/Topic</b>	Clarifications needed in Appendix G
<b>References</b>	Back River Annual Report 2024 – Appendix H: 2024 Vegetation Monitoring Program Report
<b>Summary</b>	Additional clarifications needed on metals data presented in Appendix G
<b>Detailed Review Comment</b>	<p>In the graphs in Appendix G, the following should be clarified:</p> <ul style="list-style-type: none"> <li>• Why do some metals not have baseline levels (e.g., boron, cesium, rubidium)?</li> <li>• What are the error bars – standard error? Please indicate in the caption.</li> <li>• Please indicate sample sizes in the caption.</li> </ul>
<b>Recommendation/ Request</b>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> <li>• Please provide the above requested details for all graphs.</li> </ul>
<b>Importance</b>	Low

#### 1.49 KIA-NIRB-49

<b>Review Comment Number</b>	KIA-NIRB-49
<b>Subject/Topic</b>	Noise monitoring and above threshold values and adaptive measures



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<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Page 2-31
<b>Summary</b>	Two noise level exceedances
<b>Detailed Review Comment</b>	During noise modelling to test for noise levels that were above thresholds agreed to for the mine, two locations had an average Leq that was slightly above the established threshold. One of the exceedance values was at a location N 0km, likely due to winter ice road traffic. The second exceedance location was thought to be due to the helicopter presence, and it was noted that noise was below threshold levels in the absence of helicopters. How often would helicopter noise typically be experienced along the WIR and another exceedance was thought to be caused by a helicopter landing and the time of measurements. Section 6.2.2 of the WMMP Plan includes several measures to reduce noise. Did the exceedance at KM0 result in any adaptive management measures to ensure noise levels remain below thresholds
<b>Recommendation/ Request</b>	<ul style="list-style-type: none"> <li>Please provide information on whether noise exceedances at KM0 north resulted in any adaptive management measures to reduce noise.</li> </ul>
<b>Importance</b>	Low

### 1.50 KIA-NIRB-50

<b>Review Comment Number</b>	KIA-NIRB-50
<b>Subject/Topic</b>	Deficiencies Recorded During Monitoring
<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Figure 2.7-1
<b>Summary</b>	Open Sea Cans
<b>Detailed Review Comment</b>	A surprisingly high number of deficiencies were reporting that involved open sea cans (35 occurrences) during the monitoring period in 2024. It is noted that staff were reminded to close sea cans as a response, but this seems to have been a large scale and persistent problem that could potentially expose wildlife to various problematic substances. Can B2Gold comments on why so many sea cans were being left open and if more can be done to ensure this stops? Perhaps only certain personnel can be designated to open sea cans for others needing to utilize their contents, and those individuals can be assigned responsibility for negligence, with greater consequences (and likely responsibility due to their designated role).
<b>Recommendation/ Request</b>	<ul style="list-style-type: none"> <li>Please provide some additional adaptive management steps for open sea cans, as reminders do not seem to have mitigated the problem in 2024.</li> </ul>
<b>Importance</b>	Moderate



### 1.51 KIA-NIRB-51

<b>Review Comment Number</b>	KIA-NIRB-51
<b>Subject/Topic</b>	Monitoring frequencies
<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Figure 2.6-1
<b>Summary</b>	The MLA has very few months with monitoring and inspections compared to other locations at site.
<b>Detailed Review Comment</b>	Figure 2.6-1 shows a graph of the number of weeks with inspections/monitoring by month at the MLA and at Goose camp. While Good was monitored most months, except for September, the MLA was only monitored for one week in each of September, October, November and then for 3 weeks in December.
<b>Recommendation/Request</b>	The KIA requests the following information: <ul style="list-style-type: none"> <li>• Why were no inspections done in September 2024 at Goose?</li> <li>• Why was the MLA not inspected earlier than September when presumably shipments and activities would have begun at site in August.</li> <li>• Why is the MLA not being inspected between January and August, when Goose undergoes inspections?</li> </ul>
<b>Importance</b>	Moderate

### 1.52 KIA-NIRB-52

<b>Review Comment Number</b>	KIA-NIRB-52
<b>Subject/Topic</b>	Overlap of the Back River PDA (Goose and MLA) with spring migration
<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Table 3.4-2
<b>Summary</b>	The PDA overlap with the 50 and 90% UD for Bathurst and Beverly/Ahiak herds is provided without consideration of indirect habitat loss.
<b>Detailed Review Comment</b>	The values calculated do not account for indirect habitat loss overlap with the same UD. In previous years the KIA
<b>Recommendation/Request</b>	<ul style="list-style-type: none"> <li>• Please provide the PDA + indirect habitat loss values of the 50 and 90% UD for Bathurst and Beverly/Ahiak herds.</li> </ul>
<b>Importance</b>	Moderate-High

### 1.53 KIA-NIRB-53

<b>Review Comment Number</b>	KIA-NIRB-53
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<b>Subject/Topic</b>	Use of Nagy 2011 dates for life history period transitions of the Bathurst and Beverly/Ahiak herds
<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Table 3.4-1
<b>Summary</b>	Dates used to define life history stages of the 2-3 herds that interact with the project are taken from a paper in 2011. The accuracy of those dates today is unclear.
<b>Detailed Review Comment</b>	Date shifts have been occurring in other herds due to climate change. There are now new and evolving R codes that enable one to look at movement rates for each collared individual to determine the start of migration periods, calving, etc. There may be some utility in using data to explore whether Nagy dates are still accurate- if they are shifting due to climate change and other factors, date ranges used in UD analyses may actually include animals involved in more than one life history event (e.g. Within the period defined for “spring migration” by Nagy, 2011, some may be migrating while some may still be overwintering). The phenomenon of grouping multiple animals together while they are doing adjacent life history behaviours can result in UD that are much larger than in reality, or that are substantially shifted geographically from where they actually should be/are for each life history phase.
<b>Recommendation/Request</b>	The KIA requests the following: <ul style="list-style-type: none"> <li>• Please use modern movement rate analyses to test whether Nagy dates are accurate or if date ranges may include animals in two different life history phases.</li> </ul>
<b>Importance</b>	Moderate

#### 1.54 KIA-NIRB-54

<b>Review Comment Number</b>	KIA-NIRB-54
<b>Subject/Topic</b>	Behaviour that states “Interacting with infrastructure” needs more information
<b>References</b>	2024 Wildlife Mitigation and Monitoring Report, Table 3.7-4
<b>Summary</b>	Summary data by camera ID include behaviours like “Interacting with infrastructure, which is vague
<b>Detailed Review Comment</b>	As part of the purpose of camera monitoring of project infrastructure is to help understand interactions between wildlife and the mine, please provide more details in the body of the report beyond “Interacting with Infrastructure” such that the reader can quickly glean whether the interactions are negative, neutral, or positive.
<b>Recommendation/</b>	The KIA requests the following:



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<b>Request</b>	<ul style="list-style-type: none"> <li>Please provide more detail in camera ID summaries about interactions with infrastructure and what these were.</li> </ul>
<b>Importance</b>	Moderate

### 1.55 KIA-NIRB-55

<b>Review Comment Number</b>	KIA-NIRB-55
<b>Subject/Topic</b>	Fish and Fish Habitat (Phytoplankton)
<b>References</b>	Appendix E SWQ Baseline Appendix C – 2024 Chlorophyll as Data Section 1.0 to 4.0
<b>Summary</b>	Results of comparison study reported that chlorophyll a concentrations and total volume filtered generated using the 1.2 µm GF/C filters were higher than when using the 0.45 µm GF/C filters.
<b>Detailed Review Comment</b>	Data collection for chlorophyll a were done using 0.45 µm GF/C filters in 2011, 2012, 2013, 2018, 2021, and 2024, especially baseline data of phytoplankton.
<b>Recommendation/Request</b>	Provide explanation why 0.45 µm GF/C filters was selected over the other 1.2 µm GF/C filters for data collection in 2011-2024, especially during baseline period. Provide scientific rationale for changing data collection method during mid-BACI study design and provide comparisons of cost-effective field programs between the two methods. Provide scientific reasoning and/or examples where data collection of fish habitat variables changes during BACI study design and maintain the integrity of BACI study.
<b>Importance</b>	Moderate

### 1.56 KIA-NIRB-56

<b>Review Comment Number</b>	KIA-NIRB-56
<b>Subject/Topic</b>	Fish habitat (water quality)
<b>References</b>	2024 Annual Report Section 4.5.7 Project Certificate Condition No. 21 Appendix E SWQ Baseline Section 2.5
<b>Summary</b>	Increasing trends of water quality parameters were evident in 2024 which includes more frequent and recent exceedances of water quality guidelines.



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<b>Detailed Review Comment</b>	The updated AEMP 2.0, which contains the water quality data, is not included in the Report. This report would help understand the context and potential implications of the increasing trends.
<b>Recommendation/Request</b>	Provide explanations for increases in water quality parameters and exceedances including rationales for recent increases .
<b>Importance</b>	Moderate

### 1.57 KIA-NIRB-57

<b>Review Comment Number</b>	KIA-NIRB-57
<b>Subject/Topic</b>	Fish and Fish Habitat
<b>References</b>	Appendix G Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization Section 3.1
<b>Summary</b>	15 mortalities of Arctic Grayling were reported over 159 hours of operations of fish trap. Traps were moved and modified twice in response to incidental mortalities.
<b>Detailed Review Comment</b>	Fish trap was the least efficient sampling method compared to dip-netting and angling during spring program.
<b>Recommendation/Request</b>	Provide guideline and SOP to minimize impacts of sampling for key fish species. Provide planning to monitor water flow variables near trap sites or frequent monitoring schedules by staff or camera of fish traps when in operation for future studies to minimize incidental mortalities.
<b>Importance</b>	Moderate

### 1.58 KIA-NIRB-58

<b>Review Comment Number</b>	KIA-NIRB-58
<b>Subject/Topic</b>	Noise monitoring – blast
<b>References</b>	2024 Annual Report Section 4.5.8 Project Certificate Condition No. 25 Appendix C WMMP-Pt 1 Section 2.5 Appendix J
<b>Summary</b>	There were over 130 days of blasting at three locations at Goose and one location at MLA in 2024. Monitoring of noise for blasting impacts were conducted mainly for wildlife (e.g., caribou, grizzly



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	bears, birds), marine mammals and people.
<b>Detailed Review Comment</b>	The report does not include monitoring related to fish and fish habitat. Proponent reported that no blasting occurred within or near required setbacks from fish bearing waters, as defined using DFO criteria.
<b>Recommendation/ Request</b>	Include a summary map of all blasting sites and distance to nearby waters
<b>Importance</b>	Low

### 1.59 KIA-NIRB-59

<b>Review Comment Number</b>	KIA-NIRB-59
<b>Subject/Topic</b>	Figures (Appendix A) not included
<b>References</b>	Appendix D – Water Management Plan – Appendix A – p.83 of PDF
<b>Summary</b>	No appendices were included with the Water Management Plan.
<b>Detailed Review Comment</b>	The Water Management Plan document that we reviewed did not include any appendices. The inclusion of maps with major water management infrastructure and/or diagram summarizing flow paths would help the reader to better understand the Water Management Plan.
<b>Recommendation/ Request</b>	Provide maps with major components of the water management infrastructure and provide diagrams showing major flow paths to clarify the Water Management Plan.
<b>Importance</b>	Moderate

### 1.60 KIA-NIRB-60

<b>Review Comment Number</b>	KIA-NIRB-60
<b>Subject/Topic</b>	Increased chemical concentrations in west Goose Lake adjacent to mine site
<b>References</b>	Appendix E – 2024 Surface Water Quality Report
<b>Summary</b>	Concentrations of many parameters in 2024 were elevated in the western basin of Goose Lake relative to previous years and relative to the lake's main basin.
<b>Detailed Review Comment</b>	Following construction activities that have expanded the disturbed mine site area in 2024 relative to 2023 (as is evident from inspection of satellite imagery) concentrations of many parameters have increased in the western basin of Goose Lake (i.e., adjacent to the project area) and are much higher than in the rest of the lake.



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	The increasing trends and guideline exceedances (for cyanide, nitrate, nitrite, and several metals) were noted in the report but there was no discussion of links to project activities or mitigation measures.
<b>Recommendation/ Request</b>	Given the magnitude of the concentration increases, number of parameters for which concentrations have increased, and the number of parameters in excess of guideline values, it is requested that links between project activities and the change in water quality in the western basin of Goose Lake be discussed (i.e., potential mechanisms be identified) and that mitigation measures be planned in case concentrations continue to increase in 2025 and to expand spatially beyond the west basin of the lake.
<b>Importance</b>	Moderate

### 1.61 KIA-NIRB-61

<b>Review Comment Number</b>	KIA-NIRB-61
<b>Subject/Topic</b>	Chlorophyll-a filter type change
<b>References</b>	Appendix E – 2024 Surface Water Quality Report – Appendix C – p.79 of PDF
<b>Summary</b>	Interpretation of chlorophyll-a results is inconsistent/misleading.
<b>Detailed Review Comment</b>	<p>In Section 4.0 of Appendix C (of Appendix E) it is stated that:</p> <p>“Although chlorophyll a concentrations generated using the 1.2 µm GF/C filters appear to be higher than those collected using the 0.45 µm cellulose membrane filters, which could poses the risk of inaccurate comparisons to historical data, the risk is low.”</p> <p>This statement is confusing, misleading, and inconsistent with the results presented earlier by the authors (i.e., the 1.2-um data were significantly higher than the 0.45-um data) and with the remainder of the text in the paragraph which states that the difference is ~30% and that additional comparisons should be made to develop a conversion factor (which is a logical next step, as is switching to the 1.2-um pore size filters).</p>
<b>Recommendation/ Request</b>	The misleading statement regarding chlorophyll-a in Section 4.0 should be removed.
<b>Importance</b>	Moderate

### 1.62 KIA-NIRB-62

<b>Review Comment Number</b>	KIA-NIRB-62
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<b>Subject/Topic</b>	Terrestrial Environment / Permafrost Monitoring
<b>References</b>	Project Certificate Condition No. 11 & 12
<b>Summary</b>	No information provided on permafrost mapping.
<b>Detailed Review Comment</b>	<p>PCC No. 11 states that <i>"The Proponent shall conduct further permafrost mapping to document permafrost temperature, thickness of seasonal thaw and amount of ground ice in the project development area."</i></p> <p>PCC No. 12 states that <i>"The Proponent shall monitor the effects of the Project on permafrost conditions relative to project infrastructure, including associated roads, waste rock stockpiles, trails, quarries, wind turbine generators, solar panel array, Battery Energy Storage System, transmission lines, and service roads."</i></p> <p>It is understood that B2Gold Nunavut contracted SRK Consulting Inc. to prepare a Thermal Monitoring Plan, which was provided in the 2023 NIRB Annual Report (Appendix D). The Site-wide Ground Thermal Monitoring Plan (SRK, April 2024), included historical data and some initial ground temperature readings from 2023.</p>
<b>Recommendation/ Request</b>	<p>Considering that substantial project progress has been made in 2024, it is recommended that B2Gold Nunavut provide updated ground temperature data, allowing for timely identification of potential thermal disturbances. It is further recommended that current monitoring locations be cross validated with locations for which historic ground temperatures are available, to allow for assessing long-term changes, if such had occurred.</p> <p>It is further requested that B2Gold Nunavut provide information on a qualitative discussion on the amount of ground ice in the project development area based on the information available.</p>
<b>Importance</b>	Moderate

Thank you.

John Roesch, P.Eng.

Senior Hope Bay Project Officer  
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment