



Outlook

[EXTERNAL] Transport Canada's comments for 2025 Annual Report - B2Gold Back River Project

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Date Tue 2026-05-12 2:20 PM

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Good day,

In response to the Nunavut Impact Review Board's April 13, 2026 request, Transport Canada has reviewed B2Gold's Back River Project 2025 Annual Monitoring Report. Please note that Transport Canada's review was limited to those areas of the monitoring report that are relevant to the Department's mandate and jurisdiction/areas of expertise.

Transport Canada's comments on the Back River Project 2025 Annual Monitoring Report cover three topic areas:

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

1. Marine Safety

Comment Number:	TC-01
Subject/Topic:	Inspections - Marine Transportation; Oil Handling Facility
References:	2025 Annual Report - none
Comment:	<ul style="list-style-type: none"> • The Project's oil handling facility is in compliance with regulatory requirements as per part 8 of the <i>Canada Shipping Act, 2001</i>. • The Back River facility meets the requirements of the Marine Transportation Security Regulations and remains in compliance. The certificate for Occasional-use Marine Facility is current and valid. • No inspection or enforcement activities were undertaken last year by Transport Canada at the OHF or marine facility.
Conclusion/Request	None

Comment Number:	TC-02
Subject/Topic:	Project's Oil Pollution Emergency Plan (OPEP) and Oil Pollution Prevention Plan (OPPP)
References:	2025 Annual Report; 4.7.1 Accidents and Malfunctions (Annual Report, pp. 4-235 – 4-239) <ul style="list-style-type: none"> • NIRB #360671 Appendix O – Marine Laydown Area Oil Handling Facility: Oil Pollution Prevention Plan and Oil Pollution Emergency Plan (OPPP/OPEP) <ul style="list-style-type: none"> • NIRB # 360695
Comment:	To demonstrate compliance with Terms and Conditions #'s 89-92, the Proponent references the Oil Pollution Prevention Plan & Oil Pollution Emergency Plan (Version 05-31-2025).
1. Gap/Issue	
2. Disagreement with the Annual Report conclusion	

3. Reasons for disagreement with the Annual Report conclusion 4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix	The proponent submitted an updated OPPP/OPEP to Transport Canada's Marine Safety and Security Environmental Response Program in 2025. For the information of reviewers, it should be noted that updates to the Emergency Response Regulations require Oil Handling Facility (OHF) operators to submit annually their OPPP and OPEP to Transport Canada. If the plans are not updated, the must notify TC that there are no updates. However, a change in operations does trigger a requirement to submit updated plans 90 days before the change. Further, as required under the <i>Canada Shipping Act, 2001</i> , the facility will need to notify Transport Canada of proposed changes to the OHF's operations relating to the loading or unloading of oil to or from vessels 180 days in advance of the change.
Conclusion/Request	None.

Comment Number:	TC-03
Subject/Topic:	Shipping Management
References:	Appendix P - Shipping Management Plan (Ver. 3, March 2025) • NIRB #360696
Comment: • Gap/Issue • Disagreement with the Annual Report conclusion • Reasons for disagreement with the Annual Report conclusion • Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix	Transport Canada recommends the Proponent ensure vessel operators serving the Project are aware of the 2026 Annual Notice to Mariners, and in particular section A2 Marine Mammal Guidelines and Marine Protected Areas, section 7A Voyage Planning for Vessels Intending to Navigate in Canada's Northern Waters, and section 7C Vessels Intending to Navigate in Kitikmeot Region in Canada's Northern Waters (see: Annual Notice to Mariners at: Notices to Mariners 1 to 46 - Annual Edition 2026).
Conclusion/Request	Transport Canada requests that the above information be brought to B2Gold's attention.

2. Navigation Protection

Comment Number:	TC-04
Subject/Topic:	Permits – Navigation Protection Program
References:	2025 Annual Report, Table 1.2-1: Permit Registry
Comment: • Gap/Issue • Disagreement with the Annual Report conclusion • Reasons for disagreement with the Annual Report conclusion • Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix	As noted on in Table 1.2.1, Transport Canada's Navigation Protection Program (NPP) has issued three approvals for works associated with the Project's marine laydown area (MLA): • 2012-600767-002 – MLA Discharge Pipeline Authorization • 2012-600767-003 – MLA Intake Pipeline Authorization • 2012-600767-006 – MLA Lightering Barge Authorization Regarding the above three NPP approvals for the Project: • NPP received no complaints about navigation related to the project in 2025. • NPP did not carry out any inspections for the project in 2025. As an update to Transport Canada's comments on the 2024 Annual Report (see NIRB Doc. #356261, TC-05), B2Gold submitted the required Transfer of Ownership to NPP in April 2026. With this Transfer of Ownership, authority over the three NPP approvals listed above has moved from Sabina Gold and Silver Corporation to B2Gold.
Conclusion/Request	None.

3. Transportation of Dangerous Goods (TDG)

Comment Number:	TC-05
Subject/Topic:	Transportation of Dangerous Goods (TDG) / Hazardous Materials
References:	2025 Annual Report • NIRB # 360671

<p>Comment:</p> <ul style="list-style-type: none"> • Gap/Issue • Disagreement with the Annual Report conclusion • Reasons for disagreement with the Annual Report conclusion • Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix 	<p>No TDG monitoring was carried out at the Back River Project by Transport Canada in 2025. No complaints/concerns regarding TDG were received by Transport Canada, and the Department did not undertake any enforcement actions.</p> <p>Other than the matters documented in Comment Number TC-06 regarding documentation of the disposal of hazardous material off-site, Transport Canada's TDG Group has no concerns with the 2025 Annual Report.</p>
Conclusion/Request	None
Comment Number:	TC-06
Subject/Topic:	Off-site shipping of hazardous materials / transportation of dangerous goods (TDG)
References:	2025 Annual Report; Table 4.4-1 – Unauthorized Discharges <ul style="list-style-type: none"> • NIRB # 360671
<p>Comment:</p> <ol style="list-style-type: none"> 1. Gap/Issue 2. Disagreement with the Annual Report conclusion 3. Reasons for disagreement with the Annual Report conclusion 4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix 	<p>Table 4.4-1 lists several spills where the spilled material was prepped for disposal off-site. However, manifests documenting the shipping of hazardous materials / dangerous goods were not included with the Annual Report.</p> <p>NOTE: Transport Canada's TDG group will be following up with B2Gold for information regarding the disposal of dangerous goods / hazardous wastes for the B2Gold's Back River Project.</p>
Conclusion/Request	<ol style="list-style-type: none"> 1. B2Gold <u>must</u> register in Transport Canada's Client Identification Database if they meet the criteria outlined in Section 17.3 of the Transportation of Dangerous Goods Regulations (https://tc.canada.ca/en/dangerous-goods/client-identification-database-cid). 2. That future annual reports for the Back River Gold Mine Project provide information and copies of documents, such as manifests, regarding the transportation of dangerous goods and hazardous materials for the Project, including <i>nil</i> comments. Part of this information would be the inclusion of all hazardous waste manifests for the Project, if any. This information would support reviews of future annual reports.

Please follow-up with me if you have any questions about Transport Canada's review of the 2025 Annual Report for the Back River Project.

Regards,

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I am grateful to live and work in Winnipeg, which is located in Treaty One Territory, the home and traditional lands of the Anishinaabe (Ojibwe), Ininew (Cree), and Dakota peoples, and in the National Homeland of the Red River Métis. I try to affirm by my actions my recognition that First Nations, Inuit, and Métis peoples, as the original peoples of this country and as self-determining peoples, have Treaty, constitutional, and human rights that must be recognized and respected.