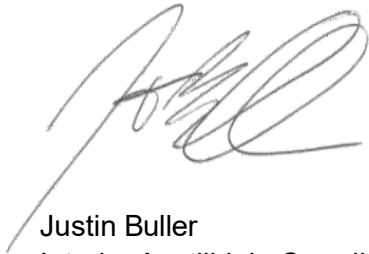


The GN appreciates participating in the review of this annual monitoring report for the Back River Project through the NIRB's process. Should there be any concerns or need for follow-up, please feel free to contact me at jfbuller@gov.nu.ca.

Thank you,



Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 37
Responsible Party	No
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Goose Project 2025 Annual Report – Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report, Part 1. (March 2026) • B2Gold Nunavut. Back River Project 2024 Annual Report – Appendix C: 2024 Wildlife Mitigation and Monitoring Report, Part 1. (March 2025) • B2Gold Nunavut. Back River Project 2023 Annual Report – Appendix C: 2024 Wildlife Mitigation and Monitoring Report, Part 1. (March 2024) • Government of Nunavut. Government of Nunavut Comments on 2023 Annual Report for B2Gold Corporation’s Back River Project (July 2024) • Government of Nunavut. Government of Nunavut Comments on 2024 Annual Report for B2Gold Corporation’s Back River Project (June 2025)
IDENTIFICATION OF ISSUE	
<p><u>Vehicle Traffic</u> The GN notes that, as indicated in B2Gold Nunavut’s (B2Gold; Proponent) 2025 Wildlife Mitigation and Monitoring Program Report (2025 WMMPR), the Goose Project (Project) traffic levels have exceeded the Final Environmental Impact Statement (FEIS) prediction for the second year in a row.</p> <p><u>Pre-Blast Surveys</u> The GN notes that the Proponent has made improvements to conducting and reporting pre-blast surveys in 2025.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p><u>Vehicle Traffic</u> The Proponent states, “if traffic levels are higher than estimated in the FEIS for 3 consecutive years and if deemed required by the NIRB, then B2Gold Nunavut will assess road effects on caribou at that time (Section 7.3.1.8 of the WMMP Plan).” (B2Gold Nunavut, 2026, p. 31)</p>	

The GN has summarized the number of one-way trips made on the WIR reported for the past several years and notes that the Proponent has exceeded FEIS predictions concerning this topic in both 2024 and 2025:

Annual Report Year	Number of one-way trips	% Increase from FEIS Prediction	Reference
2023	1,614	-15%	B2Gold Nunavut, 2024, p. 28
2024	3,116	164%	B2Gold Nunavut, 2025, p. 35
2025	7,330	286%	B2Gold Nunavut, 2026, p. 2-9

Pre-Blast Surveys

For the past two annual reporting cycles, the GN has requested improved consistency in how the Proponent conducts and reports pre-blast surveys (GN, 2024; GN, 2025). In reviewing Section 2.5 of the 2025 WMMPR, the GN notes that the Proponent completed and documented pre-blast surveys for each day that blasting took place.

REQUEST(S)/RECOMMENDATION(S)

Vehicle Traffic

The GN has flagged this item for the Nunavut Impact Review Board’s (NIRB) awareness.

Pre-Blast Surveys

N/A

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 37–39; 41–45, 47–51, and 53
Responsible Party	Yes (38, 43, 44, 51 only)
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Goose Project 2025 Annual Report. (March 2026) • B2Gold Nunavut. Goose Project 2025 Annual Report – Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report, Parts 1–3. (March 2026)
IDENTIFICATION OF ISSUE	
The GN notes that the Annual Report materials do not include the required reporting for these TCs.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Under Reporting Requirements for TCs 37–39; 41–45, 47–51, and 53, it states,</p> <p style="padding-left: 40px;">“Information regarding how Inuit Qaujimagatuqangit, Indigenous and Community Knowledge, and changes suggested by the Inuit Environmental Advisory Committee and the Caribou Technical Advisory Group have been incorporated into the WMMPP <u>should be discussed in the Proponent’s annual report</u>. The Proponent should also include a discussion of how local Hunters and Trappers Organizations and potentially affected communities have been engaged and consulted in relation to relevant components of the WMMPP.”</p> <p>*<u>Emphasis added</u></p> <p>It is not clear, based on the information presented in the 2025 Annual Report materials, how these reporting requirements have been met.</p>	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent ensure the Annual Report addresses the reporting requirements outlined above.	

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 41
Responsible Party	No
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Goose Project 2025 Annual Report. (March 2026) • B2Gold Nunavut. Goose Project 2025 Annual Report – Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report, Part 1. (March 2026) • B2Gold Nunavut. Back River Mine: Wildlife Mitigation and Monitoring Program Plan (Version 13). (October 2024)
IDENTIFICATION OF ISSUE	
<p>The GN notes that, based on the annual report materials provided, it was not clear how the July 26 to August 31 period was managed with respect to planning of outdoor construction activities and what measures were taken to prevent impacts to wildlife.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>TC 41 states,</p> <p>“The Proponent shall demonstrate consideration for the increased potential of caribou presence in the area when planning outdoor construction activities (including site clearing, blasting, and operation of heavy equipment) during the July 26 to August 31 period. The Proponent shall also demonstrate consideration for the increased potential of caribou presence in the area during this period when constructing and operating the Energy Centre Project Infrastructure (wind turbines, solar panel array, Battery Energy Storage System, transmission lines, and service roads) including, but not limited to a discussion of the Proponent’s plans for caribou-specific mitigation, monitoring and adaptive management if there is increased caribou presence in the area.”</p> <p>Section 7.2.2.5 Construction Management of the Proponent’s WMMP states,</p> <p>“To the extent possible, and with appropriate mitigation and monitoring in place, B2Gold Nunavut will take into consideration the greater potential of caribou presence in the area when planning outdoor construction activities (including site clearing, blasting, and operation of heavy equipment) during the period of July 26 to August 31.” (B2Gold Nunavut, 2024, p. 60)</p> <p>The GN notes that Table 3.2-1 on page 60 of the 2025 WMMPR lists observations and the subsequent mitigations triggered throughout 2025. However, neither this table nor the broader Annual Report materials clearly explain how the July 26–August 31 period was managed with</p>	

respect to planning outdoor construction activities and any applicable mitigation or monitoring measures.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent improve clarity in the Annual Report regarding what measures, if any, were taken during the July 26–August 31 period. Even if no activities occurred, documenting this explicitly would enhance transparency and consistency with the TC.

GN # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 43
Responsible Party	Yes
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Goose Project 2025 Annual Report. (March 2026) • B2Gold Nunavut. Goose Project 2025 Annual Report – Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report, Part 1&3. (March 2026) • B2Gold Nunavut. Back River Mine: Wildlife Mitigation and Monitoring Program Plan (Version 13). (October 2024)

IDENTIFICATION OF ISSUE

Within the Project’s 2025 WMMPR, the Proponent indicated that approximately 400 caribou were deterred from the Goose Airstrip, in contradiction with the measures described in the Proponent’s WMMP.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Part 1 of the 2025 WMMPR states:

“Observations of caribou near the Goose airstrip included seven instances of a single individual, three instances of two individuals, one instance of 50 individuals, and one instance of approximately 400 individuals. Of these observations, deterrence was required on three occasions, and reverting a plane back to Yellowknife was required on one occasion for the group of 50 animals.” (p.35)

Part 3 of the 2025 WMMPR provides additional information regarding the instance of 50 individuals that occurred on July 21, 2025:

“Caribou observed south of airstrip and proximal to strip itself. Plane inbound and Env. Superintendent diverted plane back to Yellowknife (Hercules) to prevent stampeding toward airstrip” (p. 50)

Part 3 of the 2025 WMMPR also provides additional information regarding the instance of 400 individuals that occurred on October 21, 2025:

“Hazing. Caribou bedded and grazing 50 m south of airstrip. Flight ops performed air strip survey and observed numerous caribou on south end of airstrip. Environment were notified and mobilized to location. Observed more than 400 caribou to the south of the airstrip and

with inbound planes we needed to herd them away. Three env. personnel spread out and walked toward them. Flash flights were used and the animals were pushed far enough away for planes to safely land. Environment continued to monitor herd movement throughout the morning to ensure safety of inbound/outbound planes as well as the animal's safety. Caribou were pushed > 1.5 km south of airstrip and were last observed tracking to the southwest." (p. 51)

The Project's WMMP states:

"Prior to aircraft landing on the airstrip, a visual inspection will be conducted to identify the presence of any wildlife on the airstrip. Small groups of wildlife will be escorted off the airstrip; the flight crew will be notified by radio that such action is taking place and aircraft will not be approved to land until the airstrip is clear. If groups of greater than 25 caribou are observed on the airstrip then no action will be taken." (Page 60)

*Emphasis added

Based on the information provided, the Proponent has indicated that deterrent actions were taken, rather than delaying or suspending activities such as flights, for the group of approximately 400 caribou observed on October 21, 2025. Given the size of the group, this decision is inconsistent with the Project's WMMP and could have resulted in negative impacts to the environment, such as but not limited to a potential stampede.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent provide further information and rationale regarding the management decision on October 21, 2025, concerning 400 caribou, with references to specific sections within the Project's WMMP.

The GN requests the Proponent clarify the specific steps it will take to ensure consistency in its approach to wildlife deterrence going forward and adherence to the WMMP.

GN # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 48
Responsible Party	No
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Goose Project 2025 Annual Report – Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report, Part 1. (March 2026) • B2Gold Nunavut. Back River Mine: Wildlife Mitigation and Monitoring Program Plan (Version 13). (October 2024)
IDENTIFICATION OF ISSUE	
The GN notes potential gaps and unclear reporting in the Project’s monitoring of measures intended to reduce wildlife attractants.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 9.3.1.4 of the WMMP states, “Waste disposal facilities <u>will be monitored weekly</u> by environmental or operations staff...” (B2Gold Nunavut, 2024, p. 119). For this reporting year, this would mean the Proponent should have approximately 52 inspections for each waste disposal facility.</p> <p>Meanwhile, Section 9.3.1.3 of the WMMP states, “Environmental staff will monitor skirting and fencing on a <u>monthly basis</u>.” (B2Gold Nunavut, 2024, p. 118). For this reporting year, this would mean the Proponent should have 12 inspections for each building with skirting and fencing.</p> <p>Part 1 of the 2025 WMMPR indicates that, “building and skirting inspections were completed as a part of regular site wide inspections by Environment Department staff, in conjunction with waste management inspections, described in Section 2.6 (Figure 2.6-1).” (B2Gold Nunavut, 2026, p. 48). The GN assumes waste management inspections refer to inspections of the waste disposal facilities.</p> <p>Part 1 of the 2025 WMMPR states that, “Inspections of [Waste Management Areas (WMA)] were completed during 44 weeks at the Goose Mine and 20 weeks at MLA in 2025 (Figure 2.6-1). The number of WMA inspections at the MLA is lower than at the Goose Mine due to limited presence of Environmental Staff at the MLA; however, inspections were completed at the MLA in all weeks that Environmental Staff were present on site.” (B2Gold Nunavut, 2026, p. 42)</p> <p>From this text, the GN has several questions/remarks.</p>	

1. There is inconsistent terminology, i.e., waste disposal facilities versus waste management areas, which impacts the reviewer's ability to clearly understand whether monitoring/reporting requirements are being met.
2. While there is some value in broadly summarizing inspections at the two main Project areas (Goose and MLA), it is the GN's understanding that inspections are carried out at a more detailed level (e.g., each building or WMA). As such, the information provided by the Proponent in Appendix C: Building/Skirting and Waste Inspection Locations, 2025 (Part 3 of the 2025 WMMPR) suggests that no 'sub-location' received all 52 weeks of inspection, and several sub-locations did not appear to receive all 12 monthly inspections. However, the labelling of the table makes it difficult to discern where monthly versus weekly monitoring is applicable:

	Sub-Location	Total
Goose	Burn Pit and Landfill	39
	Construction	35
	Echo Pit Associated Areas	27
	Exploration	42
	Goose Forward Camp	9
	Goose Main Camp	39
	Maintenance	38
	Mine Ops	40
	Other	35
	Processing Facilities	9
	Site Services	7
	Supply Chain	37
	Umwelt and Associated Areas	36
	Underground	38
	WIR	26
MLA	MLA	19
	MLA Forward	3

*Modified/abridged version of the table 'Appendix C: Building/Skirting and Waste Inspection Locations.'

3. The Proponent states there is a gap in Environmental Staffing for the MLA. However, there is no indication in the 2025 WMMPR detailing how this gap will be closed.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent:

1. Use consistent terminology and ensure it is defined in documents: e.g., waste management inspections, waste management areas/waste disposal facilities.
2. Clearly label tables to indicate the frequency of monitoring required.
3. Explain any deficiency in monitoring/reporting.
4. Explain plans to improve Environmental Staff availability at the MLA.

GN # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Term and Condition No. 60
Responsible Party	No
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Appendix C: 2025 Wildlife Mitigation and Monitoring Program Report. Part 1. (March 2026) • Government of Nunavut. Government of Nunavut Comments on 2023 Annual Report for B2Gold Corporation's Back River Project (July 2024) • Government of Nunavut. Government of Nunavut Comments on 2024 Annual Report for B2Gold Corporation's Back River Project (June 2025)
IDENTIFICATION OF ISSUE	
The GN notes that while the Proponent has included an additional figure and table on the Project's use of helicopters, there remains room for improvement.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The GN notes that the 2025 WMMPR includes Table 2.4-1 Helicopters Onsite, 2025 (B2Gold Nunavut, 2026, p. 36) and Figure 2.4-1 Flights within Vertical Distance of Collar Points (B2Gold Nunavut, 2026, p. 38). The GN notes that this information does not completely address the GN's comments made in previous years (GN, 2024 & 2025).</p> <p>The GN is concerned about the absence of key flight data, particularly given that helicopter activity overlaps with periods when caribou are likely to be present in the Project area. Additionally, the 2025 WMMPR indicates that 233,503 km were flown in 2024 (B2Gold Nunavut, 2026, p. 35), which represents a significant (~159%) increase compared to the 90,031 km reported in the previous year (B2Gold Nunavut, 2025, p. 39).</p>	
REQUEST(S)/RECOMMENDATION(S)	
The GN recommends that the Proponent present helicopter figures using clear symbology to show details (where possible) such as individual flight legs, track lines colour-coded by flight height, and the location and group size of the wildlife observed in relation to the helicopter tracks.	

The GN requests that the Proponent provide comprehensive tables of flight logs, including (where possible) the date, purpose, distance, average height above ground level (m), justification for flights below 610 m, wildlife observations, and any course corrections made in response.