



BACK RIVER GOLD MINE PROJECT 2025 ANNUAL REPORT: RESPONSES TO REVIEW COMMENTS

DATE

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2025 ANNUAL REPORT:

RESPONSES TO REVIEW COMMENTS

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A handwritten signature in black ink, appearing to read 'Macoura Koné', is written over a light grey, slightly wavy horizontal line.

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1. CIRNAC (NIRB DOC. ID#361829)

B2Gold Nunavut acknowledges comments from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)/Relations Couronne-Autochtones et Affaires du Nord Canada (RCAANC) and has provided the requested information in the following sections.

1.1 CIRNAC #1 (TC11)

CIRNAC Comment (Ongoing) & Request/Recommendation

- In response to the 2023 Annual Report, CIRNAC recommended that B2Gold provide background thermal monitoring data and compare to previous results in future Annual Reports. B2Gold stated that it will include a comparison of recent readings to background readings as part of the 2024 annual reporting. CIRNAC notes that B2Gold did not provide this comparison in the 2024 Annual Report. B2Gold also stated that it plans to update the Thermal Monitoring Plan annually and will include any new data, or any data from historic locations that are able to be re-established as part of those annual updates.

B2Gold has developed an initial revision of a site-specific thermal monitoring plan to monitor ground temperature and changes to permafrost site-wide. Ground ice content based on visual estimate from frozen core has been provided in 2025 Site-wide Ground Thermal Monitoring report. However, no comparisons with previous years data and impacts to FEIS predictions have been conducted. The absence of this information limits CIRNAC's ability to evaluate whether B2Gold has collected sufficient information to inform the detailed design of project infrastructure and account for changing permafrost conditions in the project area. Upon review of the 2025 Site-wide Ground Thermal Monitoring Memo, no permafrost mapping was provided for the site. Aerial mapping is a valuable and standard tool which informs project development in areas of permafrost and ground ice. Mapping should be undertaken or updated for any new areas of development. Although B2Gold made progress in preparing a thermal monitoring plan and reporting data, CIRNAC's view is that B2Gold needs more efforts in fulfilling the requirements of Term and Condition 11 of the Project Certificate and therefore this recommendation is ongoing.

- Recommendation: (a) provide permafrost mapping for background sites vs FEIS predictions; (b) provide background thermal data comparison; (c) include new/re-established data in updated Thermal Monitoring Plan; (d) provide aerial permafrost mapping for all Project development areas annually.
- CIRNAC recommends that in future Annual Report submissions B2Gold:
 - a) Provide permafrost mapping for background sites and make comparisons to FEIS predictions in future Annual Report submissions.
 - b) Provide background thermal monitoring data and compare it to any thermal monitoring data that has been collected in the project area.
 - c) Include any new data, or any data from historic locations that are reestablished, in the updated Thermal Monitoring Plan.
 - d) Provide permafrost mapping (for example by aerial mapping identifying permafrost terrain and ground ice features) for areas of Project development, and reviewing

and refining permafrost maps based on results from the site-wide ground thermal monitoring conducted each year.

B2Gold Response

- B2Gold acknowledges these recommendations and intend to expand the permafrost characterization and mapping in future submissions as more work is completed on site.

Typically the scope of work includes additional data collection and mapping which is typically done before and around the areas of active infrastructure construction, specifically:

- Additional permafrost mapping will be developed and progressively refined in future submissions. Existing ground-ice mapping (2025 Site-Wide Ground Thermal Monitoring – Annual Reporting, Attachment 1, Figures 16 to 26) will be updated using ground-temperature data, surficial geology, LiDAR, aerial imagery, and field observations to identify permafrost terrain and ground-ice features in project development areas. These maps will be reviewed and refined annually based on results from the site-wide ground-thermal monitoring.
- Background thermal monitoring data, together with project area thermal data already compiled in 2025 Site-Wide Thermal Monitoring Plan (Appendix B) and will be updated as new data are obtained from additional ground temperature cable installations and ongoing ground-temperature monitoring.
- Any new ground-temperature data will continue to be incorporated in the updated Site-Wide Thermal Monitoring Plan, so that the monitoring network and datasets are captured and used consistently in ongoing analyses and reporting.

This planned work is intended to improve documentation of permafrost conditions at both background and development sites, and to strengthen the basis for design, operation, and closure planning in permafrost-affected terrain.

To address the requirement that *“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”*, the scope of work has focused on characterizing ground thermal and geotechnical conditions in the areas of proposed and existing infrastructure. The key elements of this work are summarized below.

1. Site reconnaissance and facility siting

- Conduct visual site inspections of the area of interest to identify suitable locations for new structures. Where practical, dam alignments and other facilities are sited on exposed bedrock, overburden with low-to-moderate ground ice, or in areas with minimal thickness of ice-rich overburden. This approach reduces the risk associated with thaw settlement and instability in ice-rich materials.

2. Geotechnical and thermal site investigation

Design and execute site investigation programs that typically include:

- Percolation drilling to characterize subsurface stratigraphy and foundation conditions.

- Material sampling for geotechnical laboratory testing (e.g., index properties, salinity testing) to support design.
- Ground ice characterization, based on systematic visual logging of drill cuttings in the field, to identify ice lenses and ice-rich zones and to estimate relative ice content.
- Temporary ground temperature measurements collected during drilling, providing point measurements of thermal conditions at depth.
- Percolation (slug/infiltration) testing to estimate foundation permeability and inform seepage and drainage design.

These activities collectively contribute to documentation of permafrost conditions, including the presence of ground ice and local thermal regime within the project development area.

3. Instrumentation and ongoing thermal monitoring

- The existing dams (Primary Pond Dam, and Saline Water Pond Dam partly constructed) are instrumented with ground temperature cables (thermistors), and ground temperatures are measured and recorded on a regular basis. These data provide continuous information on permafrost temperature, seasonal thaw depth, and longer-term thermal trends in both foundation and embankment zones.

4. Construction phase observations and as-built documentation

- During construction, we observe and record occurrences of ice lenses and ice-rich overburden and other frozen ground conditions exposed in excavations. Logging of frozen soils and ground ice is completed in accordance with ASTM D4083, which forms the basis of the construction logging sheets and is applicable to excavations and laboratory samples of frozen soils. As-built surveys are used to confirm final facility locations, foundation elevations, and the extent of overburden removal or replacement, providing a spatial framework for interpreting permafrost and ground ice conditions.

5. Operational monitoring and mitigation recommendations

- Review the locations of ponded water adjacent to earth structures and inspects nearby facilities for signs of sloughing, differential settlement, or other instability that could be associated with thawing permafrost or ice-rich soils. Where concerns are identified, mitigation measures are recommended such as installation of thermal protection barriers (e.g., placement of approx. 2 m of non-frost-susceptible fill) to reduce thaw penetration and improve foundation stability.

While this work is oriented to supporting detailed design and dam safety, it also directly contributes to the documentation of permafrost temperature conditions (via point temperature measurements), seasonal thaw behaviour (through observations of surface and near-surface performance), and the distribution and relative amount of ground ice (via drilling logs, construction observations, and as-built records) within the project development area. The data collected through these activities also provide the basis for

understanding the thermal and physical response of the permafrost foundation beneath infrastructure. This information can be used to assess long-term performance and to develop appropriate mitigation measures should they be required in the future.

1.2 CIRNAC #2 (TC12)

CIRNAC Comment (Ongoing) & Request/Recommendation

- The 2024 Annual Geotechnical Inspection Report (AGI) noted the presence of underbuilt roads, pads and other infrastructure and ponded water across the site. The presence of underbuilt roads, embankments and pads has been identified as a threat to permafrost integrity in the AGI reports since 2022. Term and Condition 12 describes requirements for B2Gold to report on measures implemented to restore and promote permafrost integrity, if degradation is observed. CIRNAC noted that evidence of permafrost degradation has been identified across the site (e.g., roads and camp pads), but B2Gold did not provide any timelines for increasing the thickness of underbuilt roads, embankments, and pads, or descriptions of any other measures that have been implemented to restore and promote permafrost integrity in the project area. The presence of underbuilt roads will continue to exacerbate permafrost degradation until an adequate fill thickness is placed and permafrost begins to aggrade into the fill. In their response to CIRNAC's comment for the 2024 Annual Report, B2Gold confirmed that this information is provided in the annual geotechnical inspection report. B2Gold had started to build up some of the all-season road alignments (specifically in the Umwelt area) with additional fill thickness post the 2024 AGI site inspection. The 2025 AGI provides partial information about underbuilt roads, embankments, and pads, however the previous recommendations were not fulfilled and are ongoing.
- Recommendation: (a) provide mapping of underbuilt infrastructure; (b) provide timeline for increasing thickness; (c) identify measures to restore and promote permafrost integrity. CIRNAC recommends that in future annual report submissions B2Gold:
 - a) Provide information and mapping relating to the locations of underbuilt roads, pads, and embankments.
 - b) Provide a timeline for increasing the thickness of underbuilt roads, embankments, and pads.
 - c) Identify any measures that have been implemented to restore and promote permafrost integrity in the project area.

B2Gold Response

a) Information and mapping of underbuilt roads, pads, and embankments

The 2025 Annual Geotechnical Inspection Report and associated photologs identify locations where road and pad thickness have been improved relative to previous inspections, and where underbuilt conditions remain a concern.

Based on visual inspections completed in September 2025, most new construction and facility upgrades carried out between September 2024 and September 2025 were developed in accordance with recommendation from B2Gold's consultants to place additional thermal protection – typically a minimum of 2 m of engineering fill above ice-rich overburden materials. The locations of these newly constructed or improved areas are

shown in the 2025 Annual Geotechnical Inspection Report, Figures 2 to 7, and documented in the accompanying photologs. These figures and photologs collectively provide an overview of the mapped areas where fill thickness has been increased and where underbuilt conditions continue to be observed.

b) Timeline for increasing thickness of underbuilt roads, embankments, and pads

In past annual geotechnical inspections, it has been recommended that underbuilt roads, pads, and embankments be upgraded to provide sufficient thermal protection (typically ≥ 2 m of suitable fill over ice-rich materials). The general approach has been to increase roads and pad thicknesses when suitable run of mine or run of quarry material is available and generally when equipment is in a given area completing other earthworks. Priority then is given to areas closer to critical infrastructure first (near ponds, buildings etc.).

c) Measures implemented to restore and promote permafrost integrity

For new construction and upgrades completed between September 2024 and September 2025 B2Gold has, in most cases, followed the recommendation from our consultants to place additional thermal protection (minimum ~ 2 m of suitable fill) over ice-rich overburden in areas of new roads, pads, and earth structures. These measures are intended to:

- Reduce thaw penetration into ice-rich foundation soils;
- Promote permafrost aggradation into the placed fill; and
- Improve long-term stability and serviceability of roads, pads, and embankments.

1.3 CIRNAC #3 (TC13)

CIRNAC Comment (Ongoing) & Request/Recommendation

- It is unclear to CIRNAC if there are sensitive landforms or associated mitigation and monitoring measures in the information provided on the Primary Pond, Umwelt Dam, or the 2023 and 2024 geotechnical investigations. The provision of this information is necessary to understand the potential impacts on any sensitive landforms that may be present in the project area. CIRNAC had commented on the 2023 Annual Report, requesting further information.
- In response to CIRNAC's comments, B2Gold indicated that it would "...provide a more concise overview of the geotechnical investigations, including sensitive landforms, that were undertaken in 2023 and 2024 in the 2024 Annual Report". This information was not provided with the 2024 Annual Report.
- B2Gold provided a summary of the geotechnical investigation work completed in the 2025 Annual Report but the provided information did not include the project's impact on the sensitive landforms and associated mitigation and monitoring measures. This recommendation is ongoing.
- Recommendation: CIRNAC recommends that B2Gold:
 - a) Confirm if sensitive landforms were identified.
 - b) Provide any mitigation and monitoring measures associated with the Primary Pond, Umwelt Dam, and the geotechnical investigations in future Annual Report submissions.

- c) Provide summaries of any geotechnical investigations undertaken each year in future Annual Report submissions.

B2Gold Response

- B2Gold understands “sensitive landforms” in permafrost terrain to be landforms that are susceptible to significant physical change when disturbed, due to their material properties, ground-ice content, hydrology, slope, and other site-specific factors. Typical examples in Arctic and sub-Arctic settings include:
 - Ice-rich polygonal ground (ice-wedge polygons)
 - Peat plateaus
 - Organic-rich palsas
 - Mineral-rich lithalsas
 - Ice-cored moraines
 - Hummocky, ice-rich terrain with thermokarst features.

In addition, thaw-sensitive ground may occur where there is high excess ice or frost-susceptible material in the subsurface, even if it is not expressed as a distinct, mappable surface landform. In these cases, subsurface data (e.g. geotechnical drilling, test pits) together with inferences from geophysical surveys are used to identify thaw-sensitive ground that may affect infrastructure and the surrounding environment.

For the Primary Pond, Saline Water Pond Dam and related geotechnical investigations, design and assessment approach from our consultants has included:

- **Air photo and desktop analysis:** As part of the design, air photo and imagery review within the future facility footprint are completed to identify ice-rich terrain, rock outcrops, historic drainage pathways, historic pond extents, and other relevant features. Based on available information, a preliminary subsurface conceptual model for the area of interest is developed.
- **Geotechnical drilling and logging of frozen soils:** The infrastructure areas to be developed for sensitive landforms and thaw-sensitive ground through geotechnical drilling programs was evaluated. Frozen soils are logged in accordance with ASTM D4083, and sampled materials are subjected to standard geotechnical laboratory testing (e.g., index properties, gradation, density, strength, and compressibility) to characterize material behaviour and ground-ice conditions.
- **Construction-phase logging of ground ice:** During construction, excavations are logged in the field to document the distribution and type of visible ground ice, again using ASTM D4083 as the basis for description. These observations are used to refine the understanding of local ground-ice conditions and to confirm whether sensitive landforms or thaw-sensitive ground are present within the immediate footprint.
- **Site-wide ground-ice summary:** A summary of ground-ice conditions from geotechnical drillholes completed across the site in the 2025 Site-Wide Ground Thermal Monitoring – Annual Reporting, Attachment 1, Figures 16 to 26 was provided. These figures illustrate the interpreted distribution of ground-ice content and thaw-sensitive ground in key project areas.

Sensitive landforms and thaw-sensitive ground have been identified in the broader project area through desktop review, drilling, and field observations, and are summarized in the 2025 Site-Wide Ground Thermal Monitoring – Annual Reporting, Attachment 1, Figures 16 to 26. For the earth

structures and facilities where consultants were directly involved in design (including the Primary Pond, and Umwelt Dam) and associated geotechnical investigations, no major sensitive landforms (such as extensive ice-cored moraines or large peat plateaus) were intersected within the final design footprints. Where localized thaw-sensitive ground or ice-rich features were encountered, these were documented and treated as design constraints (e.g., through siting adjustments or increased fill thickness).

For the Primary Pond, Umwelt Dam and related infrastructure, mitigation and monitoring measures relevant to sensitive landforms and thaw-sensitive ground include:

- Siting key trench of the dams and earth structures, where feasible, on bedrock or in areas with reduced ice-rich overburden, to minimize disturbance of highly sensitive landforms.
- Recommending additional thermal protection (typically a minimum of ~2 m of suitable fill) over ice-rich overburden where new roads, pads or earthworks are constructed, to limit thaw penetration and promote permafrost stability.
- Instrumenting key dams and structures with ground-temperature cables (thermistors) and incorporating these data into the site-wide thermal monitoring program to track longer-term thermal performance and identify any emerging thaw-related issues.

These mitigation and monitoring measures are described in the annual geotechnical inspection reports and the site-wide thermal monitoring documents. B2Gold will continue to document the interaction between infrastructure and sensitive/thaw-sensitive ground, and any associated mitigation measures, in future annual submissions. This approach is intended to ensure that sensitive landforms and thaw-sensitive ground are systematically considered in design, documented in annual reporting, and linked to appropriate mitigation and monitoring measures as required by NIRB Project Certificate No. 007, Term and Condition 13.

1.4 CIRNAC #4 (TC36)

CIRNAC Comment (Ongoing) & Request/Recommendation

- Term and Condition 36 describes that B2Gold is required to develop revegetation strategies within its Mine Closure and Reclamation Plan that support progressive reclamation, which should include exploration of the feasibility and practicality of topsoil/organic matter salvage through Project development. Revegetation strategies are to be provided within 3 years of the start of construction in the Annual Report and will include reclamation strategies for the Energy Centre Project.

In response to CIRNAC's comments on the 2022 Annual Report, B2Gold stated that research of revegetation strategies will be provided to the NIRB in 2023. This information was not provided with the 2023 Annual Report. Furthermore the 2024 Annual Report provided no information regarding any revegetation strategies developed and implemented by B2Gold. It is unclear to CIRNAC if any revegetation strategies, including topsoil/organic matter salvage strategies have been proposed.

In the 2024 Annual Report, B2Gold stated that the progressive revegetation program in the Interim Closure and Reclamation Plan (ICRP) was not fully developed as the project was in an early phase of construction, and that it would provide initial details in the 2025 Annual Report, but the updated Closure and Reclamation Plan has not been provided for the review.

- **Recommendation:** CIRNAC recommends that B2Gold:
 - a. Provide revegetation strategies that have been developed and implemented in future Annual Report submissions.
 - b. Provide results on the feasibility and practicality of topsoil/organic matter salvage

B2Gold Response

- Since the submission of the 2025 NIRB Annual Report, B2Gold has submitted a revision of the ICRP to the Nunavut Water Board for approval. B2Gold agrees that revegetation strategies that have been developed and implemented will be provided in future Annual Reports. As described in the Results section of Project Certificate Condition No. 36 of the 2025 NIRB Annual Report, B2Gold attempted to salvage the topsoil/organic layer when stripping overburden from Echo and Umwelt Open Pits, however the topsoil/organic horizons were minimal to non-existent and were not salvageable separately from the overburden. B2Gold continues to assess the feasibility of topsoil/organic material salvage in site-specific areas. Updates will be provided in future Annual Reports.

1.5 CIRNAC #5 (TC21)

CIRNAC Comment (New) & Request/Recommendation

- B2Gold used 1,745,501 kg of ANFO (~two-thirds of explosives) vs. 801,924 kg of emulsion in 2025. ANFO is a known significant source of nitrates, nitrites, and other waste products, likely contributors to increasing concentrations in mine area waterbodies.
- **Recommendation:** describe any considerations for decreasing ANFO use and increasing emulsion explosives or provide rationale for why this is not being considered.

B2Gold Response

- B2Gold Nunavut started Operations in June 2025 and is still ramping up. An emulsion plant is currently under construction. B2Gold will re-evaluate the use of ANFO versus emulsion explosives and will provide updates when the construction of the emulsion plant is completed and operational.

1.6 CIRNAC #6 (TC13)

CIRNAC Comment (New) & Request/Recommendation

- Upon review of the 2025 Annual Geotechnical Inspection Report, the document is not stamped by a Professional Engineer (P.Eng.) registered with the Northwest Territories and Nunavut Association of Professional Engineers and Geoscientists (NAPEG). This is a concern because it is a standard best practice in Canada for Engineers to sign and stamp such documents
- **Recommendation:** CIRNAC recommends that B2Gold ensure that a NAPEG-registered Professional Engineer review, stamp, and sign the Annual Geotechnical Inspection Reports

B2Gold Response

- B2Gold understands CIRNAC's concern regarding professional authentication of the 2025 Annual Geotechnical Inspection (AGI) Report and agrees that signing and stamping by a

NAPEG-registered Professional Engineer is standard practice. The 2025 AGI and related documents referred to in the comment were finalized, and were previously signed, and stamped by a Professional Engineer registered with NAPEG (last signed and stamped on March 25, 2026) but inadvertently were not included in the NIRB Annual Report. The authenticated documents are provided with this response as follows:

- Appendix CIRNAC 6_TC13-A – *Goose & MLA Project Sites – 2025 Annual Geotechnical Inspection Report* (signed and stamped)
- Appendix CIRNAC 6_TC13-B – *2025 Annual Thermal Monitoring Report* (signed and stamped)
- Appendix CIRNAC 6_TC13-C – *2025 Site-Wide Thermal Monitoring Plan* (signed where applicable).

1.7 CIRNAC #7 (TC35)

CIRNAC Comment (New) & Request/Recommendation

- Section 4.5.9 of the 2025 Annual Monitoring Report presents the requirement that the Proponent develop a progressive revegetation program as part of the ICRP. Section 6.3 of the ICRP contains information on progressive revegetation studies and suggests a revegetation research program has been initiated; however, no details have been provided and the ICRP is incomplete, in that Appendix E appears to be missing. Appendix L (Reclamation and Revegetation Literature Review) from the 2025 Annual Report provides a comprehensive review of revegetation and reclamation approaches in Arctic environments. According to the memo, the purpose of Appendix L is “to meet Nunavut Impact Review Board (NIRB) Project Certificate No. 007 Amendment No. 001 (NIRB 2024) Term and Condition 36, by providing potential options for B2Gold to consider and progress closure”. It is unclear; however, how Appendix L relates to the ICRP seeing it is presented as an appendix to the 2025 Annual Report. Given the general description of (missing) ICRP Appendix E as being “a review of revegetation programs and studies completed at other northern mine sites”, it is possible Appendix L could be a suitable replacement for missing ICRP Appendix E. In the 2025 Annual report the Proponent also refers to a July 2022 version of the ICRP; however, this document has not been provided for review.
- Recommendation: CIRNAC recommends that B2Gold
 - a. Provide details on the vegetation research program implied to in Section 6.3 of the 2021 ICRP and provide Appendix E (Reclamation Studies) for review.
 - b. Confirm the most current version of the ICRP (i.e., 2021 or 2022).

B2Gold Response

- Since the submission of the 2025 NIRB Annual Report in March of 2026, B2Gold has submitted a revision of the ICRP to the Nunavut Water Board (NWB) for approval on June 30, 2026. A copy of the ICRP submitted can be accessed on the NWB website via the link: [B2Gold Nunavut Updated 2026 ICRP submitted to NWB for Approval](#). The revised ICRP includes details on the vegetation research program and additional relevant initiatives undertaken by B2Gold. Appendix L of the 2025 NIRB Annual Report was updated in the updated ICRP.

1.8 CIRNAC #8 (TC16)

CIRNAC Comment (New) & Request/Recommendation

- The Annual Monitoring report summarizes that “The ABA program initiated in 2024, is capturing all material being removed from the pit used for construction material at site. B2Gold has limited the use of Quarry material, as the pit development is providing sufficient material for construction use. As the pattern is drilled, samples are taken, coded to the pattern and approved for use as NAG or PAG”; and “B2Gold will provide any further updates to the Borrow Pits and Quarry Management Plan to the NIRB once approved by the NWB. B2Gold will continue to provide site-specific quarry operation and management plans to the NIRB and the KIA at least 30 days prior to the use of borrow or quarry sites for review. No new quarry or borrow sites were accessed in 2025. Any amendments to existing site-specific quarry operation and management plans shall be provided in B2Gold’s annual report to the NIRB. As per Section 10 of the Borrow Pits and Quarry Management Plan: A summary of quarrying activities will be reported to the NWB, NIRB and the KIA as part of the annual reports in accordance with requirements of the Project Certificate, Licence, and Commercial Leases. Reporting will include a summary of results of the geochemical inventory and monitoring programs outlined in Section 8, including the amount of rock used from each quarry. CIRNAC notes that the summary of quarrying activities, geochemical inventory and monitoring programs were not provided in 2025 Annual report.
- Recommendation: CIRNAC recommends that B2Gold provide a summary of quarrying activities, including the geochemical inventory and monitoring programs, as well as the amount of rock quarried during the year in future annual reports.

B2Gold Response

- The 2025 Annual Report indicates that “no new quarry or borrow sites were accessed in 2025” which justifies why the summary of quarrying activities, geochemical inventory and monitoring programs were not provided in 2025 Annual report. B2Gold will provide a summary of quarrying activities, including the geochemical inventory and monitoring programs, as well as the amount of rock quarried during the year in future annual reports.

1.9 CIRNAC #9 (TC17)

CIRNAC Comment (New) & Request/Recommendation

- The Annual Monitoring Report Section 4.5.5 indicates that as part of the Tailings Management Plan, B2Gold will conduct “tests of the tailings and treatment sludges as they are produced to evaluate the potential for remobilization of arsenic of these materials.” The section appears to suggest that tailings have not been produced. Section 4.5.10 identifies that “On June 15, 2025, the Echo Tailings Storage Facility (ETSF) began receiving tailings...” CIRNAC notes that the results of testing were not supplied to validate the tested parameters.
- Recommendation: CIRNAC recommends that B2Gold clarify if testing of the tailings product produced and placed in the ETSF was subjected to tests to evaluate the potential for remobilization of arsenic from these materials. CIRNAC also recommends that the Proponent provide available results in the Annual reports to NIRB.

B2Gold Response

- B2Gold Nunavut can confirm that the tailings are being tested and results will be provided in the Annual report to NIRB. Test results from July to December 2025 are provided in Appendix CIRNAC 9_TC17. Review of the data collected from July to December 2025 shows that arsenic (As) concentrations are low and generally below the detection limits, suggesting that there is no remobilization of arsenic.

1.10 CIRNAC #10 (TC14)

CIRNAC Comment (New) & Request/Recommendation

- The Goose Project 2025 Annual Report Section 4.4.2 – Unauthorized Discharges and Spills, Table 4.4.1 indicated that some material from cleanup activities was transported for storage pending future treatment at the new Waste Management Facility, scheduled to be constructed with a soil treatment facility. The report does not identify where the contaminated material is being stored pending treatment, nor confirm that a tracking system has been implemented to prevent potential handling errors. There is a potential for handling errors or incorrect disposal associated with the longer-term storage, pending acceptance of the updated Landfill and Waste Management Plan (LWMP) and commissioning of the proposed soil treatment facility. The non-compliance was identified during the CIRNAC inspection in March 2025. As reported by B2Gold, all identified items were proactively addressed, with corrections completed prior to the formal receipt of the inspection reports.
- Recommendation: CIRNAC requests confirmation that a hazardous material tracking system has been implemented.

B2Gold Response

- B2Gold Nunavut can confirm that a hazardous material tracking system has been implemented. The Warehouse records all hazardous materials in the 'Back Haul Log', which tracks materials that are ready for shipment as well as those that have already been shipped. In addition, all documentation associated with each shipment is retained and filed with the corresponding shipment records and subsequent declarations. A copy of the 2025 manifests are provided in Appendix CIRNAC 10_TC14.

1.11 CIRNAC #11 (TC15)

CIRNAC Comment (New) & Request/Recommendation

- Section 4.5.4 of the 2025 Annual Monitoring Report presents the requirement that the Proponent develop a Progressive Reclamation Plan. Section 6.0 of the ICRP presents an approach to progressive reclamation; however, the details and specifics on implementation seem contradictory and vague.
Section 6.4 (Completed Progressive Reclamation) of the ICRP indicates “progressive reclamation has not been carried out”; however, this statement seems to contradict the summary from page 4-78 of the 2025 Annual Monitoring Report that indicates progressive reclamation activities have been initiated in November 2025 with the capping of the Umwelt Waste Rock Storage Area.
Section 6.3 of the ICRP presents information on Progressive Revegetation Studies and indicates that a revegetation research program “has been initiated;” however, no details of

the research program are provided. Reference is made to an Interim Closure and Reclamation Plan dated 2022; however, this version of the ICRP was not provided for review.

Section 4.5.7 identifies that the Site Water Monitoring and Management Plan includes “monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock areas is adequately captured and managed, as per the Mine Waste Rock Management Plan”. The section concludes that “B2Gold executed the Water Management Plan throughout 2025”, however no details or results are provided to document what monitoring and management were completed. Section 9 of the Waste Rock Management Plan indicates that a minimum 5-m thick NAG waste rock cover is created on the tops and sides of each WRSA and that Closure and Post-Closure water quality monitoring will be conducted in the WRSA areas, under the ICRP, to confirm that runoff meets applicable receiving water quality objectives

- Recommendation: CIRNAC requests that B2Gold reconcile the inconsistency between ICRP Section 6.4 and the 2025 Annual Monitoring Report to do with progressive reclamation activities. CIRNAC recommends that B2Gold provide, on ongoing basis, additional details on the progressive reclamation of the Umwelt WRSA with respect to thickness of the non-acid generating (NAG) cover, the water quality monitoring, and results of confirmation testing showing that the material used in reclamation is NAG.

B2Gold Response

- B2Gold Nunavut acknowledges CIRNAC’s comments and confirms that the inconsistencies have been rectified in the updated ICRP and 2026 Progressive Reclamation Work Plan (PRWP) submitted to the Nunavut Water Board (NWB) for approvals on June 28, 2026 and June 30, 2026, respectively. NWB invited parties to review the documents and submit comments by July 31, 2026. Copies of these documents can be accessed via the following link: [B2GN ICRP and 2026 Progressive Reclamation Work Plan](#)
- In Section 2.2 of the 2026 PRWP, B2Gold Nunavut proposed to encapsulate the Umwelt Waste Rock Storage Area by placing approximately 250,000 m³ of verified NAG rock over completed sections/benches. Additional details including water quality, thickness and test results of the materials that will be used as rock cover will be provided on an ongoing basis in the Annual Report.

1.12 CIRNAC #12 (TC72)

CIRNAC Comment (New) & Request/Recommendation

- Pursuant to Condition No. 72 of its Project Certificate, B2Gold “is encouraged to identify and register all trades occupations, journeypersons, and apprentices working with the Project, as well as to provide the Government of Nunavut with information regarding the number of registered apprentices and journeypersons from other jurisdictions employed at the project.”

In its 2025 Annual Report (page 4-200), B2Gold shares that “While no opportunities for dedicated apprenticeship training program opportunities were identified in 2025, these programs continue to be researched and developed for introduction at the Mine in the

future.” B2Gold goes on to state that updated information will be reported on in future annual report submissions.

The implementation of an apprenticeship training program has the potential to contribute meaningfully to the development of B2Gold’s workforce and to enhance the skills and capacity of Nunavut residents, as well as Nunavut Inuit who reside in other Canadian jurisdictions. Continued efforts by B2Gold to identify and integrate apprenticeship opportunities within the Project, and descriptions of measures being taken to support a successful program, would bring value to understanding project-related actions that advance education and training in the Kitikmeot Region and for Nunavut Inuit who reside outside of the territory.

- Recommendation: CIRNAC recommends that B2Gold communicate what measures it is taking to research and develop its dedicated apprenticeship training program.

B2Gold Response

- Per IIBA Schedule 8.1, Section 2(d), Career Development Plans (CDPs) are created for each interested Inuit employee at the Mine and serve as an important means for Inuit to plan the next steps in their careers, including potential advancement into skilled professional or management positions. These plans identify the necessary skills and experience to be developed and identify any training required before advancing further. Two main types of CDP can be pursued: ‘Vertical’ or ‘Horizontal’.
 - ‘Vertical’ CDPs typically focus on one of the following:
 - Leadership development (e.g. establishing a career path from frontline worker -> lead hand -> supervisor -> superintendent -> manager)
 - Specialist development (e.g. establishing a career path from frontline worker -> skilled worker -> professional -> skilled professional)
 - ‘Horizontal’ CDPs will typically focus on one of the following:
 - Same position (e.g. further growth within the current role to enhance capabilities)
 - Alternate position (e.g. interdepartmental movement to different occupational stream).

Once the type of CDP to be developed for an employee is determined, the process for developing them can be summarized as follows:

1. Employee and Human Resources build a CDP. Human Resources develop gap analysis.
2. Human Resources and Supervisor review CDP and make any adjustments.
3. Employee agrees to CDP (or further adjustments may be made).
4. Human Resources produces final CDP.
5. Department Head approves CDP.
6. Allocation of resources to implement CDP.

Resources may be allocated to implement a CDP in the following areas:

- Experiential (e.g. assignment of specific alternate work duties within principal role; appointment of a dedicated mentor (senior qualified staff) in target position; promotion to an interim role with partial authority of target position).

- Academic (e.g. participation in a specific course to enhance knowledge in a theoretical area; enrollment in a post-secondary certificate, diploma or degree; engagement in industry course work required to obtain a professional credential).
- Professional credential (e.g. support in obtaining and maintaining a relevant professional credential).

Each CDP will include information on the type of plan being pursued, current employee/employment information, target position, anticipated timelines, and details of actions that will be taken to execute the CDP.

B2Gold Nunavut has held several discussions with the Career Services team at the Government of Nunavut to help in the design of its training programming, specifically apprenticeship training. Further, B2Gold Nunavut has been engaged with the KIA through the Inuit Employment Working Group to develop the Back River Inuit Training Program, which includes an apprenticeship training program. B2Gold Nunavut has also attended several employment-focused sessions hosted by Rio Tinto (e.g., Diavik Mine) related to human resource matters and closure of facilities in the NWT.

1.13 CIRNAC -TC67

CIRNAC Comment & Request/Recommendation

- The department's Nunavut Regional Office is a member of the Back River Project Socio-Economic Monitoring Working Group. It participated in the development of the working group's Terms of Reference, which were last revised in August 2024. Through this working group, the department contributes to the collaborative analysis and interpretation of data for reporting purposes and assesses the effectiveness of project-related activities. The department also provides updates on actions under the Nunavut General Monitoring Plan. As the plan continues to be developed, relevant indicators and socio-economic monitoring data will be made available.

B2Gold Response

- B2Gold Nunavut acknowledges CIRNAC's comment and understands that there are no responses required at this time.

1.14 CIRNAC -TC68

CIRNAC Comment & Request/Recommendation

- Through its participation in the Back River Socio-Economic Monitoring Working Group, the department contributes to the review and implementation of the Back River Socio-Economic Monitoring Program, which is authored by B2Gold Nunavut. The working group provides a forum to discuss its associated monitoring plan and review socio-economic data collected through the program.

B2Gold Response

- B2Gold Nunavut acknowledges CIRNAC's comment and understands that there are no responses required at this time.

1.15 CIRNAC -B2GN COMMITMENT #6

CIRNAC Comment

- In 2025, CIRNAC conducted three inspections under the Type A Water Licence No. 2AM-BRP1831, as well as Crown Lease 076J12-7-2. An overview of the inspections is provided in CIRNAC main report. B2Gold has committed to addressing outstanding compliance issues and CIRNAC Inspectors will continue working with B2Gold to ensure compliance with all applicable conditions associated with the Back River Project. Primary outstanding non-compliance: secondary containment for hazardous materials, small waste management, and refueling areas.

B2Gold Response

- B2Gold Nunavut acknowledges CIRNAC's comment and will continue working with CIRNAC to address any outstanding compliance issues identified during the 2025 inspections provided in CIRNAC main report. To ensure easy follow-ups and documentation, B2Gold Nunavut will continue providing responses to any outstanding inspection requests under a separate cover as previously requested by CIRNAC.

2. DFO (NIRB DOC. ID#361827)

B2Gold Nunavut acknowledges DFO's comments and has provided the requested information in the following sections.

2.1 DFO -TC25

DFO Comment & Request/Recommendation

- No near-water blasting occurred in 2025. No comments from DFO.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

2.2 DFO – TC26

DFO Comment & Request/Recommendation

- DFO confirms the joint inspection of the Rascal Stream West culvert and the bank slumping at the overflow culvert. The banks were subsequently re-sloped by the Proponent and confirmed with photographs sent to DFO. DFO also confirms the Proponent's statements regarding the airstrip gravel material in Rascal Stream East and the immediate clean-up activities completed by the Proponent. Discussion between DFO and the Proponent are ongoing regarding the monitoring of potential impacts to fish and fish habitat in Rascal Stream East throughout 2026 open-water season. Follow-up actions will depend on monitoring results and the timeline for completing diversion and fishway construction (tentatively proposed for fall 2026). Note - in Appendix I - Fish Offsetting Plan, the document states "appendices intentionally not included as no change from 2019 plan". However, the Fish Offsetting Plan was updated in 2025 during the FAA amendment process.

B2Gold Response

- B2Gold Nunavut acknowledges the comment and is committed to continue to minimize impacts on fish and fish habitat and to engage DFO on the evaluation of mitigation measures, where required.

2.3 DFO – TC27

DFO Comment & Request/Recommendation

- DFO confirms ongoing discussions with B2Gold Nunavut regarding the follow-up studies at Lake 997 to determine the level of impact to fish and fish habitat (if any) caused by the exceedance in allowable under-ice water withdrawal. B2Gold Nunavut has also proposed new operational measures in order to avoid water withdrawal exceedances from reoccurring along the winter ice road, originally proposed to DFO in March 2026 then expanded upon in the 2025 NIRB Annual Report. DFO will continue to monitor the effectiveness of these proposed measures and will work with the Proponent to determine any impacts at Lake 997 contravening the Fisheries Act. Corrective measures and/or offsetting for fish and fish habitat impacts will follow, if applicable. DFO also confirms

reporting on monitoring activities associated with the Goose Lake Outflow were included in B2Gold Nunavut's 2025 Fisheries Act Authorization Annual Report.

B2Gold Response

- B2Gold acknowledges DFO's comment and can confirm that planning is underway for follow-up studies at Lake 997. Water withdrawals from Goose Lake in 2026 are not expected to trigger the requirement to monitor and report on water withdrawals in 2026, as per Section 4.7 of the Back River Fish Offsetting Plan.

2.4 DFO-TC28

DFO Comment & Request/Recommendation

- The exceedance at Lake 997 represents a non-conformity with the Letter of Advice issued by DFO, whether a Fisheries Act non-compliance has occurred has yet to be determined. DFO will continue to work with the Proponent to determine any impacts to fish and fish habitat caused by the exceedance in under-ice water withdrawal at Lake 997. Corrective measures and/or habitat offsetting will follow, if applicable. The Proponent has proposed new operational measures to avoid and mitigate such exceedances from re-occurring along the WIR. DFO will continue to monitor this situation over the coming winter seasons.

B2Gold Response

- B2Gold acknowledges DFO's comment and can confirm that planning is underway for follow-up studies at Lake 997.

2.5 DFO-TC64

DFO Comment & Request/Recommendation

- DFO has not been consulted in the most recent version of the marine mammal monitoring standard operating procedure (SOP) (Back River Mine Marine Shipping – Wildlife Mitigation and Monitoring published December 2025). Project Certificate condition 64 has not been satisfied by the Proponent as consultation with DFO has not been conducted for this document. It is unclear if communities and other interested parties have also been consulted. Note – DFO has not reviewed the December 2025 version of the SOP. Upon request of the SOP in March 2025, B2Gold Nunavut provided DFO the July 2024 version of the document. DFO has recently reviewed the SOP and identified concerns with the methods for marine mammal monitoring. The SOP outlines that marine mammal monitoring is voluntary, to be completed only when and if time allows (the exception being if there was an incident involving a marine mammal, such as a vessel strike). Furthermore, marine mammal monitoring is completed by vessel crew members – there are no dedicated monitors on-board with appropriate education, experience, and training. Project Certificate condition 64 requires consideration for full-time, trained marine wildlife monitoring – the current SOP significantly falls short of the expectations established in the certificate. The data collected by voluntary surveyors also does not include bearings, nor precise calculations for distance – which is highly important for mitigating disturbance and avoiding incidents with marine mammals. DFO suggests B2Gold Nunavut develop a marine mammal monitoring SOP with consultation from DFO, communities, and other interested parties (as stipulated by Project Certificate condition 64). Priority items for the updated SOP would be i) requiring adequately trained, experienced, and educated MMO staff on-board each

vessel, ii) staff dedicated towards marine mammal monitoring (non-voluntary) throughout transit, and iii) developing standardized survey methodologies (i.e. rotating shifts, transects/scans/mixed methods, etc.) with improved data collection requirements, specifically adding determining bearings and precise distances between vessels and marine mammals. DFO is working towards publication of standards for education, experience, and training requirements for MMOs - in the meantime, DFO is willing to discuss the subject and our draft standards with the Proponent. DFO is committed to working with the Proponent to ensure a marine mammal monitoring SOP is developed to be sufficiently protective of marine mammals and their habitat, and to the satisfaction of communities and other relevant parties.

B2Gold Response

- B2Gold Nunavut appreciates DFO's willingness to work collaboratively. B2Gold will update the SOP to make the MMO duties obligatory rather than voluntary, and will outline a more prescriptive methodology, following industry standards for other mines in Nunavut (e.g., Agnico Eagle Meadowbank and Meliadine). B2Gold will continue to use vessel crew for monitoring as it is not industry practice to use a full-time MMO staff on board each vessel servicing mine sites, communities, or by DFO vessels in the Northwest Passage.

2.6 DFO-TC65

DFO Comment & Request/Recommendation

- The most recent version of the Shipping Management Plan was published in August 2018 by Sabina. DFO recommends B2Gold publish an updated Shipping Management Plan, ensuring it includes measures to avoid and mitigate prohibited effects to marine mammals and their habitat, as well as comply with the following Acts and Regulations: Marine Mammals Regulations, i) Section 7 of the Marine Mammal Regulations (Fisheries Act) prohibits the disturbance of marine mammals. Generally, disturbance is interpreted as disruption to an animal's normal life processes, resulting from intentional human activities (e.g., to pursue, accompany, overtake, encircle, approach repeatedly, hunt, disperse, drive or herd individuals or groups of marine mammals). This applies equally to divers, kayaks, motor boats and aircraft. Disturbance response thresholds vary among individuals, species, and locations, ii) DFO recommends that watercraft should survey the area for marine mammals to avoid disturbing them. If marine mammals are encountered, and remain in the area, effort should be made to avoid disturbing them by rerouting, slowly navigating around their location at a reduced speed and maintaining their distance. Marine mammals should not be approached, in general, within 100 m and 400 m for Species at Risk. Please see the approach distances set out in Schedule VI of the Marine Mammal Regulations for specific setback based on species and location, iii) in certain circumstances, the proponent can apply for an authorization to disturb marine mammals (see: Application instructions for the authorization of marine mammal disturbance), iv) DFO recommends reviewing the Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment to avoid disturbing marine mammals v) DFO recommends consulting with local communities to avoid known marine mammal aggregation areas. Species at Risk Act (SARA) - SARA's general prohibitions makes it an offence to i) Kill, harm, harass, capture, or take an individual of a species listed in Schedule 1 of SARA as endangered, threatened, or extirpated, ii) possess, collect, buy, sell, or trade an individual of a species listed in Schedule 1 of SARA as endangered, threatened, or extirpated, iii) damage or destroy the residence

(e.g. nest or den) of one or more individuals of a species listed in Schedule 1 of SARA as endangered, threatened, or extirpated, if a recovery strategy has recommended the reintroduction of that extirpated species. Aquatic Invasive Species Regulations - the Proponent should avoid and mitigate risk related to the importation, possession, transportation or release of aquatic invasive species set out in Part 2 of the schedule of the Aquatic Invasive Species Regulations; and/or the introduction of aquatic species into regions or bodies of water frequented by fish where they are not indigenous. Marine Protected Areas, i) Proponent must adhere to the Tarium Naryutait Marine Protected Areas Regulations and the Anguniaqvia niqiqyuam Marine Protected Areas Regulations, ii) DFO requests that ships avoid transiting through the MPAs and advises that a geo-fence is in place to identify and alert the appropriate organizations when vessels cross the boundaries. Parks Canada in Nunavut - Anyone planning to enter a Parks Canada protected area should contact Parks Canada directly at: permits.nunavut.permis@pc.gc.ca.

Other measures - Proponent should consider integrating the following tools when planning, i) most recent ISR Cruise Ship Management Plan, ii) most recent NOTMAR, iii) latest Beaufort Sea Beluga Management Plan on FJMC website, iv) latest Recommended Nunavut Land Use Plan on the Nunavut Planning Commission Public Registry. Proponent should report abuse or harassment (Fisheries Act violation), through Crime Stoppers: 1-800-222-TIPS (8477), marine VHF radio channel 16, or online. Proponent should report marine pollution through 1-867-979-5269, DFO.CCG.ArcticERDO-ODIEArctique.GCC.MPO@dfo-mpo.gc.ca, lqaNordreg@innav.gc.ca, or marine VHF radio channel 16. Additional information on marine mammals is available on DFO's website.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment regarding mitigation and protection of marine mammals. B2Gold will update the SOP to outline a more prescriptive methodology, following industry standards for other mines in Nunavut (e.g., Agnico Eagle Meadowbank and Meliadine). The SOP will also include locations of MPAs to ensure the companies are aware of their locations and the regulations surrounding them. In addition, B2Gold will provide shipping companies with references to the regulations listed in DFO's comment above prior to the Goose Project shipping season.

2.7 DFO-TC93

DFO Comment & Request/Recommendation

- No in-water works at the MLA in 2025. No comments from DFO. DFO September 2025 site visit inspected Llama Lake, Rascal Stream culverts, Goose Lake pumphouse, and MLA. Site is largely compliant. DFO Science staff collected field data at Llama Lake supporting research on northern lake ecosystem habitat and trophic structure.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

2.8 DFO-COMMENT IN B2GN COMMITMENT #5

DFO Comment & Request/Recommendation

- DFO issued two Fisheries Act Authorization amendments to the Proponent in 2025. B2Gold was generally in compliance with its FAA and the Fisheries Act.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

2.9 DFO- COMMENT IN B2GN COMMITMENT #6

DFO Comment & Request/Recommendation

- DFO confirms the Proponent takes prompt action to report and remedy any non-compliances. DFO confirms B2Gold Nunavut is not in contravention of the Fisheries Act.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

2.10 DFO-COMMENT IN B2GN COMMITMENT #7

DFO Comment & Request/Recommendation

- B2Gold provided a Letter of Credit to DFO during the FAA process.

B2Gold Response

- B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

3. ECCC (NIRB DOC. ID# 361830)

B2Gold Nunavut acknowledges Environment and Climate Change Canada (ECCC) comments and has provided the requested information in the following sections.

3.1 ECCC #5 (TC2)

ECCC Comment & Request/Recommendation

- Project Certificate Condition No. 2, Air Quality – Air Quality Mitigation and Adaptive Management, has as its objective “To ensure that mitigation and adaptive management measures effectively mitigate impacts on-site.” There is a fairly comprehensive detailing of air quality and meteorological monitoring locations, instrumentation, results, and discussion. As can be expected, there are initial challenges in setting up new instrumentation to function properly in a remote location with extremes in meteorological conditions. Diagnosis of the dustfall and continuous monitoring of fine particulate (PM2.5) data incorporates measurement locations and emission sources, with wind direction a consideration for the influence of the Goose incinerator on PM2.5 values measured at the Hill Meteorological Station. However, diagnosis of nitrogen dioxide (NO2) concentrations did not consider ambient wind directions. Above a low wind speed threshold, wind directions at the Hill Meteorological Station would have a reasonable correlation with those at other monitoring stations. Incorporating wind direction in the analysis would assist in emission source attribution and thus enable refinements in mitigation measures. This is important as emission sources and intensities will evolve with the transition of the project from the construction to the operations phase.

The diagnosis noted an increasing trend in monitored NO2 at the Hill Meteorological Station from October to December that appeared to plateau before the end of the year. This observed trend was attributed to an increase in diesel fuel combustion emissions associated with heating the nearby Exploration Camp. However, the incidence of surface-based temperature inversions, which vertically trap air emissions, would also be expected to increase during the same period with the rapid lengthening of nighttime duration, and may also be a significant contributing factor.

- Recommendation: ECCC recommends the Proponent:
 1. Consider likely wind direction and changes in emission source locations and intensities when diagnosing incidents of higher NO2 concentrations and indicate what subsequent refinements in mitigation measures may be required.
 2. Extend the analysis of monitored NO2 concentrations at the Hill Meteorological Station further towards the end of the winter to assess the influence of low-level temperature inversions which vertically trap some project emissions.

B2Gold Response

- B2Gold acknowledges the recommendation and a wind direction analysis on continuous air quality monitoring results will be performed when investigating elevated/exceeding concentrations. This analysis will be included in future annual reports. There is currently not enough information to properly assess potential impacts of temperature inversions on monitored concentrations. However, it is noted, that they may have contributed to the elevated NO2 concentrations recorded by the Hill Meteorological Station Kunak.

The Hill Meteorological Station only has one temperature sensor, and therefore, the on-site meteorological data can not be used to identify low-level temperature inversion events, their characteristics, or their frequency. While low-level temperature inversions are expected near Goose Lake during fall and early winter when the lake is freezing, the height of the inversions above the lake may not always be greater than the height of the Exploration Camp above the lake, which is estimated to be more than 5 metres above the lake. B2Gold will evaluate adding additional temperature sensors at varying heights to the Hill Meteorological Station to identify temperature inversions to support the analysis of air quality monitoring results.

3.2 ECCC #1 -AGI-M8-RECOMMENDATIONS

ECCC Comment & Request/Recommendation

- The geotechnical inspection identified multiple deficiencies in containment systems (Recommendation 2025-AGI-M-8) at fuel storage areas, including damaged or exposed high-density polyethylene (HDPE) liners, insufficient anchoring, and areas lacking adequate secondary containment (e.g., temporary fuel and lubricants storage facility). Compromised containment systems increase the likelihood of uncontrolled releases of hazardous materials to the environment, particularly under extreme weather or operational stress and could negatively impact water quality, fish and fish habitat and migratory birds.
- Recommendation: ECCC recommends the Proponent:
 1. Inspect and repair all containment liners to meet design specifications.
 2. Ensure all containment systems are adequately anchored and protected from damage (e.g., UV exposure, mechanical stress).
 3. Confirm that all fuel storage areas provide effective secondary containment at all times before any hazardous materials are stored.

B2Gold Response

- B2Gold can confirm that containment systems are adequately anchored and protected from damage. Fuel storage areas provide in general effective secondary containment. Plans to address the damaged liners identified at Goose are being completed and repairs will be done in due course.
- B2Gold will continue to conduct weekly internal inspections and take action to address any deficiencies observed or identified.

3.3 ECCC #2 (TC14)

ECCC Comment & Request/Recommendation

- The report identifies that a landfill dump has been established in an area exhibiting permafrost degradation and ponded water (Recommendation 2025-AGI-M-6), particularly at the former temporary fuel storage depot location. These conditions indicate a thermally unstable foundation and suggest that the landfill may be subject to ongoing thaw settlement, increased moisture infiltration, and reduced containment integrity. Landfill placement in areas affected by permafrost thaw and ponded water can significantly increase the risk of uncontrolled release of contaminants to surrounding soils and waterbodies, due to enhanced infiltration, loss of structural integrity, and potential mobilization of contaminants. Proactive management and appropriate siting/design of waste containment are required to minimize environmental risks, particularly under changing climatic conditions.

- **Recommendation:** ECCC recommends the Proponent:
 1. Evaluate the potential for contaminant migration (e.g., leachate generation and transport) under current and projected thaw conditions considering the type of waste it contains.
 2. Implement appropriate mitigation measures, which may include relocation of the landfill to a thermally stable, engineered containment area or enhancement of existing containment and drainage controls

B2Gold Response

- B2Gold will assess the area to confirm ground conditions and evaluate the extent of possible permafrost degradation during the next geotechnical investigation and results will be presented in the Annual Report. Measures will be implemented to improve drainage and prevent further ponding. Consideration will be given to building landfill to a properly prepared and thermally stable area or implementing ground protection measures to minimize any potential risk of contamination.

3.4 ECCC #3 (TC14)

ECCC Comment & Request/Recommendation

- The report identifies the presence of a hydrocarbon sheen on Goose Lake, indicating that petroleum hydrocarbons have reached a natural waterbody. The report does not clearly explain how the existing containment and mitigation measures failed to contain residual spillage from refueling and if they were functioning as designed at the time of the incident. The presence of a hydrocarbon sheen in a natural waterbody indicates a failure of containment and/or mitigation systems. Without a clear understanding of the source and transport pathway, similar releases may reoccur. Enhanced mitigation and confirmation of effective preventive measures are required to reduce the risk of future releases to the aquatic environment and associated adverse effects on water quality, fish and fish habitat.
- **Recommendation:** ECCC recommends the Proponent provide a detailed analysis of the contributing factors to the incident, including any infrastructure deficiencies and operational practices. The Proponent should also confirm whether existing spill prevention and containment measures were in place and functioning as intended at the time of the incident. In addition, the Proponent should identify and implement appropriate mitigation measures to prevent recurrence, including improvements to secondary containment systems, inspection and maintenance procedures, and spill detection and response protocols

B2Gold Response

- According to the spill report prepared at the time of the incident (June 08, 2025), the spill occurred during a refueling operation at a nearby temporary generator. The contributing factor to the hydrocarbon sheen observed on the lake is that the area was not lined and the small spills that occurred were not cleaned right away and with the snow melt and warmer weather conditions, the residual small hydrocarbon leached into the Lake. It is important to note that the hydrocarbon sheen observed was cleaned right away. The temporary generator was removed and the new permanent generator area is lined. Secondary containments are also placed under the generator to prevent and contain spills and the personnels are advised to clean up right away any spills that occur.

3.5 ECCC #4 (TC14)

ECCC Comment & Request/Recommendation

- The geotechnical inspection identifies differential settlement affecting the northernmost seacan (picture G-199 & 200) in the Sandvik laydown area, which is reported to contain UN1942 hazardous material – ammonium nitrate. Differential settlement indicates uneven ground support and suggests that the container may be subject to instability, including potential shifting or tilting. Storage of hazardous materials on uneven or unstable ground increases the risk of container tipping, structural damage, or loss of containment, which could result in an accidental release to the surrounding environment. Ensuring stable and level storage conditions is a fundamental preventive measure to reduce the likelihood of spills and associated environmental impacts.
- Recommendation: ECCC recommends the Proponent:
 1. Ensure that all seacans used for the storage of hazardous materials are placed on level, stable, and adequately engineered surfaces capable of preventing differential settlement.
 2. Assess the current condition of the affected seacan(s) and confirm that they are structurally stable and not at risk of tipping, shifting, or compromising containment.
 3. Regrade and/or reconstruct the laydown area, as necessary, to provide uniform support and minimize future settlement.
 4. Implement routine inspection and monitoring of storage areas to identify and address early signs of ground instability.

B2Gold Response

- B2Gold Nunavut confirms that all UN1942 Ammonium Nitrate are currently on level, stable, engineered pads. B2Gold will continue the weekly routine inspections and ensure any areas that are identified and classified as unstable are addressed.

3.6 ECCC #7 (TC21)

ECCC Comment & Request/Recommendation

- Section 5.2 of the Aquatic Effects Management Plan (AEMP) states, *“Survival and biomass of fathead minnows was significantly reduced, with a 50% lethal concentration (LC50) of 41%v/v and an IC25 [inhibitory concentration] of 6.7%v/v. Further information on dewatering discharge chemistry and toxicity results will be provided in the annual report.”* It is unclear why additional information and interpretation was not provided as part of the AEMP results including in Appendix H, and which “annual report” is being referred to in the statement.
- Recommendation: ECCC recommends the Proponent provide additional discussion and interpretation on the dewatering discharge chemistry and toxicity results and/or clarify where this information will be provided.

B2Gold Response

- Consistent with the requirements outlined in the Aquatic Effects Management Plan or AEMP (B2Gold 2025), an overall summary of the dewatering discharge chemistry and toxicity results

were provided in the 2025 AEMP report to provide context of the influence of dewatering discharge on Goose Lake water quality. The 2025 AEMP report concluded that the dewatering discharge had a negligible effect on lake water quality. The analytical chemistry results were presented in the Goose Project 2025 Annual Report for Water Licence 2AM-BRP1831, which was submitted to NWB. However, the toxicity results were not discussed. In future AEMP reports, the dewatering discharge chemistry and toxicity results will be presented and discussed in detail. A supplemental technical memorandum entitled “Summary of Dewatering Discharge Chemistry and Toxicity for ECCC-7 is provided in response to this comment to provide the 2025 chemistry and toxicity results as requested (Appendix ECCC 7 TC21). Analysis of the data show that the dewatering discharge quality met the Water Licence discharge limits, and there was no acute toxicity to Rainbow Trout or *Daphnia magna*. No chronic toxicity to *Ceriodaphnia dubia*, *Lemna minor*, or *Raphidocelis subcapitata* was observed in the BRP-01 sample collected on 19 August 2025. Although there were effects on Fathead Minnow survival and growth in this sample, the cause of the toxicity is unknown. As discussed in the 2025 AEMP report, the plume delineation study did not detect a plume from the dewatering discharge in West Bay.

3.7 ECCC #8 (TC21)

ECCC Comment & Request/Recommendation

- Section 5.4 provides a summary of measured water quality concentrations compared to modelled water quality predictions. Measured median and maximum concentrations for most parameters of interest in 2025 exceeded the 95th percentile concentration predicted in the West Bay and Central Bay. The number of parameters and magnitude of difference for certain parameters (e.g. nitrate, nitrite) is notable and suggests that key inputs or assumptions in the model might not be adequately representing site conditions. The Aquatic Effects Management Plan (AEMP) report acknowledges the differences in the measured vs. modelled water quality but does not provide any interpretation or discussion on what may be contributing the model underpredicting concentrations for the majority of water quality parameters. To improve predictive accuracy, a review of the model is likely warranted, potentially requiring refinements for key model assumptions, including source terms, loading rates, and dilution factors.
- Recommendation: ECCC recommends the Proponent review the water quality model to assess discrepancies between measured and modelled water quality. Where discrepancies are identified, provide a detailed evaluation of the cause, and where necessary, update the model to improve accuracy of water quality predictions.

B2Gold Response

- B2Gold will review and update the water quality model to improve accuracy of the predictions and results will be provided in future annual reports.

3.8 ECCC #9 (TC21)

ECCC Comment & Request/Recommendation

- The low action level for aquatic life was exceeded for nitrate, nitrite, and total and dissolved cobalt during the 2025 monitoring period. However, the Proponent is not proposing to establish the moderate action level at this time under the assumption that there will be no further increase in concentrations in Goose Lake in 2026. It is understood that the

Proponent has identified possible causes of the increased concentrations in Goose Lake and intends to implement additional water management, however, this does not necessarily negate the need to establish the moderate action level. The intent of response frameworks is to establish action levels paired with specific actions to respond to increasing magnitudes of environmental change and deviations from expected conditions. Without a defined moderate action level it is unclear at what threshold and under what conditions the Proponent would implement additional response or intervention to prevent effects to aquatic life.

- Recommendation: ECCC recommends the Proponent establish moderate action levels for parameters that triggered low action levels.

B2Gold Response

- B2Gold agrees with ECCC's recommendation to establish moderate action levels for parameters that triggered low action levels and will present these moderate action levels in the 2026 AEMP report.

3.9 ECCC #10 (TC21)

ECCC Comment & Request

- In response to the aquatic life guideline exceedances for nitrate, nitrite, and cobalt, the Proponent states that the existing benchmarks are "appropriate for the early years of the [Aquatic Effects Management Plan] AEMP implementation and prior to the first year of biological monitoring (to be conducted in 2026). Derivations of site-specific water quality objectives for nitrite and cobalt may be warranted in future AEMPs. " No information is provided on what conditions may trigger development of site-specific water quality objectives, given that the generic guidelines have already been exceeded. In addition, the Proponent provides discussion of other benchmarks, including the British Columbia guideline for nitrite. However, it is unclear whether they are proposing to update the benchmark for nitrite or retain the existing guideline.
- Recommendation: ECCC recommends the Proponent:
 1. Define conditions under which site-specific water quality objectives may be developed.
 2. Clarify whether any updates to the existing water quality benchmarks are proposed.

B2Gold Response

- B2Gold acknowledges ECCC's recommendation and will work on these requests. Results will be provided in future annual reports.

3.10 ECCC #11 (TC21)

ECCC Comment & Request/Recommendation

- Water quality monitoring efforts in 2025 included additional investigations to identify Project areas that may have contributed to the increase in nitrate, nitrite, and total and dissolved cobalt in Goose Lake. The results of this monitoring suggested that *"the inflow from Llama and Umwelt Lakes and the inflow from Echo Lake contributed large concentrations of nitrate and cobalt parameters after September 2023. Other sources or processes at play are also likely, especially for nitrite. Contact water, seepage and/or runoff*

flowing into these streams appear to be the likely source of increased parameter concentrations in Goose Lake in 2024 and 2025." Section 5.5.3 proposes mitigation options, including comprehensive monitoring of runoff and tributaries entering Goose Lake. However, the final recommendation (Section 6 — Summary and Recommendations) for future monitoring is to continue Aquatic Effects Management Plan (AEMP) sampling per the AEMP study design, with the addition of sampling West Bay over the next three years, regardless of dewatering activities. Continuation of monitoring at the locations established during the 2025 water quality investigative sampling may be warranted to confirm that any newly established mitigations and water management practices are functioning as intended.

- Recommendation:
 1. Continue comprehensive monitoring of the locations suspected as possible sources of the changes to water quality in Goose Lake.
 2. Provide a summary and description of any proposed supplemental monitoring during the 2026 field season, in addition to the standard AEMP design plan.

B2Gold Response

- B2Gold agrees with ECCC's recommendation to continue comprehensive monitoring of the locations suspected as possible sources of the changes to water quality in Goose. B2Gold is continuing monitoring of the runoff water when flowing to improve the understanding of the runoff quality suspected to be the potential source of the changes to the water quality in Goose Lake. In addition, sediment of the Lake and fish tissue are also being tested in 2026 to evaluate the extend of the changes that will help make inferred mitigation decisions and actions.

3.11 ECCC #12 (TC21)

ECCC Comment & Request/Recommendation

- Appendix E of the Aquatic Effects Management Plan provides time series plots for water quality. The figures depict the measured concentrations alongside the established baseline normal range, but do not currently include comparison to water quality guidelines. Including the guidelines would provide context for assessing the potential for effects to aquatic life and allow reviewers to more readily evaluate how the measured concentrations compare to the established water quality thresholds.
- Recommendation: ECCC recommends that future versions of the water quality time series plots include relevant water quality guidelines to aid in interpretation of results.

B2Gold Response

- Future AEMP reports will include relevant water quality guidelines in all time series plots.

3.12 ECCC #6 (TC22)

ECCC Comment & Request/Recommendation

- The executive summary for the annual report states, *"2025 experience[d] several challenges, including the management of contact water and uncontrolled dust deposition. The 2025 Aquatic Effects Monitoring Program (AEMP) confirmed an increase in trace metals and anions in Goose Lake relative to baseline studies and concentrations, which is a residual*

effect of uncontrolled contact water entering Goose Lake at freshet.” However, no additional information on the difficulties experienced in contact water management is included in Project Certificate Condition No. 22 (which relates directly to site water monitoring and management). The summary for PC No. 22 only states that the water management plan was implemented, and an updated version will be submitted in 2026, but no deficiencies or next steps are described. The executive summary states that the Proponent is working to develop long-term contact water management structures, but no timeline is provided on when this work is anticipated to be completed, or if there are any interim mitigation measures to be used at site in advance of a long-term solution to prevent further impacts to water quality.

Recommendation: ECCC recommends the Proponent:

1. Update the Annual Report to include a detailed description of the difficulties encountered in site contact water management that contributed to observed changes in Goose Lake water quality.
2. Provide a comprehensive outline of the planned next steps to improve site water management, including:
 - a description of proposed upgrades to existing water management or new water management structures to be constructed;
 - anticipated timelines for design, construction, and operation of any new water management structures; and
 - whether any interim mitigation measures will be implemented to manage contact water and protect Goose Lake prior to commissioning of new water management structures.

B2Gold Response

- B2Gold notes that site water management at the Goose Mine, including the Marine Laydown Area, is guided by an approved Water Management Plan and has established site water management structures, including sedimentation ponds, to manage site water and mitigate project-related impacts to the external receiving environment, including Goose Lake. The lack of engineered water management structures has limited the site ability to effectively manage contact water, which is believed to be one of the potential causes of the observed water quality changes noted in Goose Lake. We continue to advance measures to improve sitewide water management, including sediment loads to Goose Lake, through the following:
 - Surveys to identify water quality/erosion risks associated with disturbed areas on site to inform additional site-specific erosion control/surface water management requirements;
 - Review of the performance of the existing Ore Stockpile Pond to inform redesign/optimization to improve management of surface water from the Run Of Mine (ROM) ore stockpile area;
 - Improvements to maintenance practices for existing erosion control structures such as silt fencing; and
 - Exploring the establishment of additional surface water management structures such as sumps, retention ponds, berms etc., informed by site-specific conditions.

To improve freshet readiness programs from 2027 onward, we are exploring optimizations to contract the construction schedule for some of the noted surface water management structures, including sedimentation pond(s). In summary, we aim to complete the noted

activities, including the establishment of additional site surface water management structures to improve site coverage over the next two years.

3.13 ECCC #13 (TC62)

ECCC Comment & Request/Recommendation

- Project Certificate Condition No. 62 of the Annual Report and Table 1-1 of the Marine Monitoring Plan indicate that the Marine Monitoring Plan was updated in 2025, including revised reference stations, water and sediment parameters, and data analysis.
- Reference stations outlined in Version 2 of the Marine Monitoring Plan include REF-04 and REF-05, which are the same reference station names provided in the 2024 Marine Monitoring Report, so it is unclear what updates to the reference stations were implemented in 2025 monitoring. In addition, the water quality monitoring parameter list appears to be consistent between the 2024 and 2025 monitoring reports, so it is unclear what changes have been made.
- Recommendation: ECCC recommends:
 1. The Proponent provides a summary of the specific changes that were made to the reference stations, water and sediment parameters, and data analysis in the updated version of the Marine Monitoring Plan.
 2. Future monitoring plan updates should clearly identify changes, either by referencing the specific sections where revisions have occurred or by using another clear method (e.g. bold, highlight, track changes) to facilitate efficient review.

B2Gold Response

1. The previous version (Version 1.1) of the Marine Monitoring Plan (MMP) had not been officially updated and submitted to NIRB since 2018. The updates made to Version 2 of the MMP were to align the MMP with the implementation executed and submitted through the Annual Report in recent years (i.e., since 2022). ECCC is correct that the reference stations, water and sediment quality parameters, and data analysis in the MMP Version 2.0 are consistent with the 2024 report. Reference stations outlined in Version 2 of the MMP are REF-04 and REF-05 which align with the reference sites sampled in 2024 and since 2022. In the 2020 and 2021 NIRB Reports, it was identified that a more suitable/alternate reference location was needed and the Proponent worked with ECCC to identify a suitable location (Section 4.5.12 of Sabina 2021 and 2022) which was implemented and reported initially in the 2022 Marine Monitoring Report (Nunami Stantec 2023). The analysed water and sediment quality parameter list in Version 2 of the MMP is consistent with the reported parameters in the 2024 report. Distinctions in the MMP Version 2.0 from Version 1.1 included removal of two water quality parameters consistently less than the detection limit (i.e., Cesium and Rubidium) and more detailed list of hydrocarbon analytes for water and sediment quality analyses. The data analysis outlined in Version 2 of the MMP is consistent with those reported in recent years and appropriate for the dataset and scope of the MMP.
2. For changes to management plan, B2Gold Nunavut agrees it is useful to clearly describe changes. B2Gold Nunavut is working to standardize a process across all regulatory submissions.

3.14 ECCC #14

ECCC Comment & Request/Recommendation

- A page is dedicated to Figure 4-1 (Marine Monitoring Plan Sampling Stations, Back River) however, the figure is missing.
- Recommendation: ECCC recommends the Proponent update the Marine Monitoring Plan to include Figure 4-1.

B2Gold Response

- A revised Appendix M with the appropriate figure has been included with the comment responses (see Appendix ECCC 14).

4. GN (NIRB DOC. ID# 361831)

B2Gold Nunavut acknowledges comments from the Government of Nunavut (GN) and has provided the requested information in the following sections.

4.1 GN #01 (TC37)

GN Comment & Request/Recommendation

- Vehicle Traffic- 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. Pre-Blast Surveys- The GN notes that the Proponent has made improvements to conducting and reporting pre-blast surveys in 2025. The GN notes that the Annual Report materials do not include the required reporting for this TC.
- Request:
Vehicle Traffic
 - The GN has flagged this item for the Nunavut Impact Review Board's (NIRB) awareness.

B2Gold Response

- B2Gold Nunavut acknowledges GN's comments regarding Winter Ice Road (WIR) traffic levels and the adaptive management commitments outlined in the WMMP. As described in the WMMP, additional analyses related to caribou crossing behaviour may be considered and shared with the NIRB if recorded traffic volumes exceed the levels predicted in the FEIS for three consecutive years. While traffic volumes exceeded FEIS predictions during the 2024 and 2025 WIR seasons, these years largely reflected construction-phase activities and associated transportation requirements. Traffic volumes for the 2026 WIR season will be reported in the 2026 Annual WMMP Report. Based on current information, traffic levels are expected to return to, or remain below, the levels predicted in the FEIS. This expectation is influenced in part by the shorter 2026 WIR operating season, which extended from February to early April, as well as the closure of the WIR prior to the commencement of the principal caribou spring migration period on April 15, 2026. The FEIS predicted that, during operations, average traffic volumes along the WIR would be approximately 40 one-way truck trips per day (Section 5.5.2.4 of the FEIS). As the Project transitions from construction to operations, B2Gold Nunavut anticipates that traffic volumes in 2026 will remain consistent with, or below, this predicted operational level. B2Gold Nunavut will continue to monitor and report WIR traffic volumes annually and assess results in accordance with the adaptive management framework established in the WMMP.

4.2 GN #02 (TC38)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMP, nor how local

- Request: The GN requests that the Proponent ensure the Annual Report addresses the reporting requirements outlined above.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.3 GN #02 (TC39)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMP, nor how local HTOs and communities have been engaged.
- Request: The GN requests that the Proponent ensure the Annual Report addresses the reporting requirements outlined above.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.4 GN #03 (TC41)

GN Comment & Request/Recommendation

- 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.
- Request: 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.

B2Gold Response

- B2Gold Nunavut acknowledges the GN's comment and recommendation regarding Term and Condition (TC) 41 and the management of outdoor construction activities between July

26 and August 31. B2Gold Nunavut takes its wildlife mitigation commitments seriously and provides the following details to clarify how this period was managed in 2025:

Information Gathering and Communications: To manage the increased potential for caribou presence during this window, B2Gold Nunavut integrated multiple data sources to inform site leadership. This included reviewing GNWT satellite collar maps, conducting visual scans for uncollared animals near the project footprint, and utilizing helicopter overflights to maintain real-time situational awareness. Critical wildlife updates and awareness notices were actively communicated to site teams during operational meetings and via "Enviro Flashes."

2025 Activities and Mitigations: Outdoor construction activities did occur during the July 26 to August 31 period; however, they were executed in strict adherence to the Wildlife Mitigation and Monitoring Program Plan (WMMPP). While some resident caribou were observed near the site during this time, behavioral monitoring sheets completed by environmental staff confirmed that the animals displayed no signs of distress or adverse effects from operations. No visual observations or collar data triggered the need for activity shutdowns or modifications, as caribou did not enter the established threshold distances where construction impacts would occur.

B2Gold Nunavut appreciates the GN's feedback. To ensure full transparency and compliance with TC 41 in future reporting, B2Gold Nunavut will include clearer detail regarding any planning, monitoring efforts, and operational context for the July 26–August 31 window within all subsequent annual reports, even if no mitigation is required.

4.5 GN #02 (TC41)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.6 GN #02 (TC42)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.7 GN #04 (TC43)

GN Comment & Request/Recommendation

- Within the Project's 2025 WMMPP, the Proponent indicated that approximately 400 caribou were deterred from the Goose Airstrip, in contradiction with the measures described in the Proponent's WMMP. The GN notes that the Annual Report materials do not include the required reporting for this TC.
- Request: 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.

B2Gold Response

- The primary restriction outlined in Section 7.2.2.6 of the Project's WMMP Plan—which dictates that no action be taken if groups greater than 25 caribou are observed—is explicitly specific to animals **on the airstrip** to prevent sudden flight or stampede hazards during landing sequences.

B2Gold Nunavut wishes to clarify a typographical ambiguity in the original wildlife hazing log entry for October 21, 2025. **The herd of approximately 400 caribou was never positioned on the active airstrip**, but rather the animals were bedded and grazing approximately 50 meters off the southern edge of the airstrip (beyond Rascal Stream East or RSE). Because the herd was outside the active landing surface boundary, the proactive management actions taken were fully compliant with the intent of the WMMPP. The decision to implement low-stress deterrent measures was evaluated and authorized by the

Environment Department, balancing wildlife welfare, seasonal sensitivity (i.e., being outside of the post-calving season), and site safety:

- **Seasonal Sensitivity:** The incident occurred in late October, well outside the sensitive calving and post-calving periods (WMMPP Section 7.2.2.6). The group was uncollared, meaning no advance telemetry data was available to forecast their sudden proximity to the site.
- **Behavioral Assessment & Proactive Mitigation:** Upon notification from Flight Operations, Environment personnel monitored the group for over 20 minutes to allow the animals to move away by their own accord. When they remained stationary during a scheduled major crew change flight window, the potential risk of an inbound aircraft inadvertently triggering an unmanaged, northward stampede *onto* the active airstrip was identified.
- **Execution of Low-Stress Herding:** To eliminate this risk, three Environment personnel utilized a passive, low-stress herding technique. Personnel spread out and walked slowly toward the group from the north using flash flights (visual deterrents) to gently encourage movement away from the infrastructure. The animals were successfully and calmly directed >1.5 km southwest of the airstrip. Post-mitigation monitoring confirmed that the movement was orderly, resulted in zero negative impacts to the environment or animal welfare, and caused no signs of distress or stampeding.

This management action was also fully supported by B2Gold Nunavut's internal operational frameworks, which provide site personnel with structured, humane guidelines for managing wildlife proximal to infrastructure to ensure both human and animal safety when distinct spatial thresholds are breached. To ensure strict adherence to the WMMPP and clear reporting going forward, B2Gold Nunavut will implement the following actions:

- **Reporting Standardization:** Environmental and Flight Operations logs will be updated with stricter data-entry protocols to precisely delineate between wildlife *on* infrastructure versus wildlife *proximal to* infrastructure, avoiding future reporting ambiguity.

4.8 GN #02 (TC44)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring,

and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.9 GN #02 (TC45)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.10 GN #02 (TC47)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.11 GN #05 (TC48)

GN Comment & Request/Recommendation

- 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. 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. 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:
- Request: 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.

B2Gold Response

- B2Gold Nunavut acknowledges that the terms "Waste Disposal Facilities" and "Waste Management Areas (WMA)" were used interchangeably in the report, creating lack of clarity. In future annual reports B2Gold Nunavut will standardize and define this terminology to ensure a clear distinction between broad management areas and specific disposal facilities. Future report tables will be updated to show the required inspection frequency (e.g., weekly vs. monthly) alongside the actual completed count. This will allow reviewers to easily verify compliance metrics. The variation in inspection counts across different locations is primarily caused by two main factors:
 - **Operational Seasonality:** Several listed sub-locations—such as the Goose Forward Camp, Exploration areas, and specific construction zones—are not active or occupied year-round. Inspections are only triggered when these areas are operational or accessible. Intermittent inspections, however, are conducted to verify compliance under snow-free conditions during summer (i.e., when they're not active). B2Gold Nunavut will clarify asset status (active/inactive) in future reporting to contextualize these numbers.
 - **Resource Constraints:** Operational scaling and competing site logistics during the reporting period impacted the Environment Department's routine scheduling. To resolve this, B2Gold Nunavut is currently revising and refining inspection templates and scheduling tools to optimize field time and ensure consistent coverage of all active infrastructure.

To ensure consistent tracking and eliminate coverage gaps, B2Gold Nunavut is actively implementing the following capacity-building measures:

- **Headcount and Logistics:** Management has increased environmental staffing levels at the Goose Mine.
- **MLA Dedicated Rotation:** Management has developed and formalized rotational schedule to deploy Environmental Technicians to the Marine Laydown Area (MLA) on a three-week cycle. This will guarantee continuous, year-round environmental oversight at the MLA during all operational phases.

4.12 GN #02 (TC49)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.13 GN #02 (TC50)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges GN's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community

perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.14 GN #02 (TC51)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.15 GN #02 (TC53)

GN Comment & Request/Recommendation

- Annual Report does not address how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge, and IEAC/CTAG input have been incorporated into the WMMPP, nor how local HTOs and communities have been engaged.
- Request: Ensure future Annual Reports explicitly address these reporting requirements. The GN notes that the Annual Report materials do not include the required reporting for this TC.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the incorporation of community perspectives, Inuit Qaujimajatuqangit (IQ), and Traditional Knowledge (TK) into the WMMP Report. Section 1.1.2 of the WMMP Report is intended to provide a summary of how community perspectives, IQ, and TK have informed Project planning, monitoring, and reporting activities. To improve transparency and readability, B2Gold Nunavut will consider revisions to future WMMP reports that more clearly identify the integration of community perspectives, IQ, and TK (for example, B2Gold Nunavut will consider adding a column to Appendix A of the WMMP Report to clearly show this information).

4.16 GN #06 (TC60)

GN Comment & Request/Recommendation

- 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.
- Request: 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.

B2Gold Response

- B2Gold Nunavut acknowledges GN's comments regarding reporting of helicopter flight data and the implementation of wildlife mitigation measures during aircraft operations. B2Gold Nunavut provides the following clarification regarding the available flight information and associated reporting considerations. It should be noted that B2Gold Nunavut has been working on methods to easily visualize helicopter data, but that there are few options for an intuitive graphic of these data. The vast majority of helicopter flights are between Goose and a few locations – the MLA, George Camp and drill sites near the mine – meaning that most of the flights are overlapping on a map and quickly become confusing when presented on a single map. To view these data singly would require hundreds of maps. It's for this reason that an analysis of helicopter data is conducted to provide an intuitive metric of helicopter flights and distances from wildlife.

B2Gold Nunavut receives position logs from helicopter service providers that are generated from onboard tracking systems. These logs record operational information including geographic location, altitude, and speed at approximately two-minute intervals while the aircraft is operating. Although altitude data are available, the values are reported relative to sea level and do not account for local topography. Consequently, altitude values alone do not provide an accurate measure of the vertical distance between the aircraft and the ground surface. As a result, generating summary tables that accurately depict flight height above ground level cannot be readily derived from the available flight records. B2Gold Nunavut also notes that helicopter altitude restrictions and wildlife mitigation measures are applied in response to observed wildlife. Therefore, reporting altitude information for all helicopter flights, without reference to wildlife observations or operational context, would not provide a meaningful representation of the mitigation measures implemented by pilots during flight operations.

The flight records provided to B2Gold Nunavut are limited to operational data such as aircraft location, altitude, and speed. The additional information requested by the reviewer is not routinely recorded by pilots and is therefore not available for reporting. During flight operations, pilots are responsible for maintaining the safety of the aircraft, passengers, and crew, and their primary focus must remain on the safe operation of the aircraft. B2Gold Nunavut recognizes the importance of documenting wildlife observations associated with aviation activities and has worked with aviation contractors to support the verbal reporting

of wildlife sightings through established communication channels. These observations can be used to improve awareness of wildlife presence and assist with the implementation of appropriate mitigation measures during flight operations. B2Gold Nunavut appreciates the reviewer's suggestion and will continue to evaluate opportunities to improve the documentation and reporting and can be discussed with the CTAG.

5. HC (NIRB DOC. ID# 361832)

B2Gold Nunavut acknowledges Health Canada's (HC) comments and has provided the requested information in the following sections.

5.1 HC #01 (TC2)

GN Comment & Request/Recommendation

- Exceedances of nitrogen dioxide (NO₂), dustfall, and PM₁₀ merit further consideration to ensure potential health risks are adequately addressed. Both Condition 2 of the Project Certificate and the Air Quality Monitoring and Management Plan (AQMMP) require monitoring results to be compared to FEIS predictions and relevant guidelines. Where exceedances occur, additional analysis, monitoring, and mitigation are to be undertaken, as needed.
In 2025, recorded NO₂ and dustfall levels exceeded the predictions in the FEIS, the Canadian Ambient Air Quality Standards (CAAQS), and the Government of Nunavut's Environmental Guideline for Ambient Air Quality¹. Concentrations of particulate matter (PM₁₀) also exceeded FEIS predictions at Goose Camp (24-hour: 69 µg/m³), which the Annual Monitoring Report (AMR) attributed to a haul road constructed in 2025 and diesel generators not accounted for in the FEIS. HC notes the planned relocation of the Goose air quality station in 2026 and encourages selecting a location that remains representative of, and protective for, potentially exposed human receptors. Proactive monitoring at relevant locations can help address reported exceedances and uncertainty in the FEIS air quality modelling.
Regarding the NO₂ exceedances, the AMR states (PDF p. 84): "Since the only observed continuous NO₂ exceedances were related to CAAQS or a surrogate to CAAQS (i.e., WHO AQG), which is intended to be used for regional airshed management and not to assess project effects (CCME 2020), further investigation into the exceedances to evaluate the need for mitigation measures or additional monitoring was not warranted, and therefore not completed."
HC considers NO₂ a non-threshold contaminant for human health effects; therefore, any increase in exposure can result in an incremental population health risk. As such, the CAAQS are not "pollute-up" to levels, as health effects can occur at concentrations below the CAAQS, and HC recommends consideration of the best available and economically achievable technology and techniques to keep NO₂ and other air pollutants as low as reasonably achievable.
HC acknowledges that World Health Organization (WHO) guidelines were considered in the 2025 AMR and supports this approach in addition to the CAAQS. HC encourages continued efforts to reduce emissions to levels that do not exceed applicable guidelines.
- Recommendations:
 1. HC suggests that updating the air quality portion of the health risk assessment using observed concentrations and/or revised modeling would ensure that the AQMMP reflects current conditions and better aligns mitigation and monitoring with assessed risks.
 2. Given the documented exceedances of NO₂, dustfall, and PM₁₀ relative to predictions and relevant guidelines, HC recommends considering additional mitigation measures to reduce emissions.
 3. Apply both CAAQS and WHO guidelines as benchmarks for continuous air quality improvement, acknowledging that health effects can occur below CAAQS levels and that these standards are not intended as "pollute-up" to thresholds.

B2Gold Response

- B2Gold plans to update the Final Environmental Impact Statement (FEIS) air dispersion modelling results (Sabina 2015) with as-built emission sources to better understand where air quality impacts are predicted to be the greatest and to also identify the main source contributors to those impacts. The updated air quality dispersion model will be used to inform mitigation measures going-forward, such as identifying problem sources that could be improved through control measures or moved to an area where it would have less impact on ground-level concentrations. The updated model will also help inform the potential need to install or relocate monitoring stations to predicted problem areas. This work is planned for 2027 and updated information will be incorporated into future Annual Reports. Future reports will apply both the CAAQS and WHO guidelines as benchmarks when accessing continuous air quality monitoring results and the need for mitigation measures.

5.2 HC #02 (TC9)

GN Comment & Request/Recommendation

- The Noise Abatement Monitoring Plan (NAMP) does not consider for off-duty workers at the “Worker’s Camp”, so potential annoyance and sleep impacts remain unverified. See HC-02.

B2Gold Response

- B2Gold Nunavut respectfully notes that off-duty workers at the Worker Camp were considered part of the noise monitoring program. A total of 21 noise measurements were collected inside worker dormitories/sleeping accommodations to assess potential impacts on off-duty workers, including potential annoyance and sleep disturbance. The measured indoor noise levels averaged 49.3 dBA, with a range of 39.2 to 63.1 dBA. These results demonstrate that the worker accommodations provide effective attenuation of external operational noise, resulting in lower indoor noise levels than those generated by outdoor sources. The following mitigation measures have also been implemented since the project start up to minimize noise impacts at the worker accommodations:
 - Camp power generators are housed within enclosed generator buildings, which significantly reduce noise emissions. Noise measurements collected outside these generator buildings were below 85 dBA, demonstrating the effectiveness of the acoustic enclosures.
 - Only a limited number of stationary noise sources are located in close proximity to the worker camp, with the camp generators being the primary continuous source. Their location and enclosure design minimize noise propagation.
 - Site infrastructure has been planned and constructed with consideration for noise reduction to limit the potential impact of operational activities on worker accommodations.

To improve clarity, future revisions of the Noise Abatement Monitoring Plan will explicitly identify worker accommodations as monitoring locations and summarize the assessment methodology and results, demonstrating consideration of off-duty workers, consistent with the intent of Project Certificate Condition.

5.3 HC #02 (TC10)

GN Comment & Request/Recommendation

- The Noise Abatement Monitoring Plan (NAMP) does not consider for off-duty workers at the “Worker’s Camp”, so potential annoyance and sleep impacts remain unverified. See HC-02.

B2Gold Response

- B2Gold Nunavut respectfully notes that off-duty workers at the Worker Camp were considered part of the noise monitoring program. A total of 21 noise measurements were collected inside worker dormitories/sleeping accommodations to assess potential impacts on off-duty workers, including potential annoyance and sleep disturbance. The measured indoor noise levels averaged 49.3 dBA, with a range of 39.2 to 63.1 dBA. These results demonstrate that the worker accommodations provide effective attenuation of external operational noise, resulting in lower indoor noise levels than those generated by outdoor sources. The following mitigation measures have also been implemented since the project start up to minimize noise impacts at the worker accommodations:
 - Camp power generators are housed within enclosed generator buildings, which significantly reduce noise emissions. Noise measurements collected outside these generator buildings were below 85 dBA, demonstrating the effectiveness of the acoustic enclosures.
 - Only a limited number of stationary noise sources are located in close proximity to the worker camp, with the camp generators being the primary continuous source. Their location and enclosure design minimize noise propagation.
 - Site infrastructure has been planned and constructed with consideration for noise reduction to limit the potential impact of operational activities on worker accommodations.

To improve clarity, future revisions of the Noise Abatement Monitoring Plan will explicitly identify worker accommodations as monitoring locations and summarize the assessment methodology and results, demonstrating consideration of off-duty workers, consistent with the intent of Project Certificate Condition.

5.4 HC #03 (TC96)

GN Comment & Request/Recommendation

- Health Canada remains available to review harvest study plans or results upon request. See HC-03.

B2Gold Response

- B2Gold Nunavut acknowledges HC’s comment and kind offer to review harvest study plans or results. B2Gold Nunavut will reach out when required.

6. HofK (NIRB DOC. ID# 361828)

B2Gold Nunavut acknowledges comments from the Hamlet of Kugluktuk (HofK) and has provided the requested information in the following sections.

6.1 HofK #01 (TC62)

HofK Comment & Request/Recommendation

- Kugluktuk acknowledges that the Annual Report provides technical information on marine shipping and monitoring. However, from a municipal perspective, the conclusions would benefit from clearer linkage to community travel routes, harvesting access, and marine safety considerations relevant to Kugluktuk residents. As a regional coastal community, Kugluktuk experiences indirect exposure to marine activity associated with the Project. Additional explanation of how marine monitoring results inform adaptive management related to community navigation and safety would strengthen confidence in the conclusions presented.
- Request: clearer community-focused reporting, including linkage to navigation safety, harvesting access, and adaptive management triggers related to marine activity.

B2Gold Response

- During the 2025 shipping season, only one vessel traveled from the west and transited through the Lambert Channel past Kugluktuk. The Goose Project shipping only occurs during the open water season; therefore, there is no ice breaking and no interactions with on-ice movement routes for harvesting. Figure 8.2-2 in the WMMP Report shows the track of the one vessel that transited past Kugluktuk in September 2025. Crew onboard that vessel completed 21 surveys for marine mammals during their transit, and no sightings were recorded. Adaptive management triggers related to marine shipping include the following:
 1. As per Marine Mammal Regulations s 7(3), the vessel will always maintain a minimum of 100 m from marine mammals;
 2. Avoid ship strikes with marine mammals by slowing the vessel and allowing marine mammals to move out of the way; noise can also be reduced by 1.5–2.8 dB for every 1 knot reduction in speed, reducing disturbance; and
 3. Change ships heading to avoid groups of marine mammals.

6.2 HofK #03 (TC66)

HofK Comment & Request/Recommendation

- The Municipality notes that most findings are presented through technical appendices. While this information is important, clearer plain-language summaries of monitoring results relevant to communities would support municipal understanding and communication with residents. Kugluktuk considers accessible reporting to be an important component of effective effects monitoring and confidence in the validity of conclusions.

- Request: Include plain-language community summaries highlighting key monitoring results and adaptive actions.

B2Gold Response

- B2Gold Nunavut appreciates there is often considerable information included in its Annual Reports, as required by the NIRB process. However, we strive to include plain language executive summaries at the beginning of both our main Annual Report (e.g. Pages i to xi in the 2025 NIRB Annual Report) and discipline-specific reports where appropriate (e.g. Pages iv to vii in the 2025 Socio-Economic Monitoring Report). These sections highlight key monitoring results and activities at the Goose Mine from the preceding year. In addition, B2Gold Nunavut regularly presents plain language monitoring summaries directly to communities through our ongoing engagement programs. Specific to socio-economic monitoring, we engage the Kitikmeot Socio-Economic Monitoring Committee (KSEMC) and Back River Socio-Economic Monitoring Working Group (SEMWG) at least annually and also present to Kitikmeot residents during our annual community tours. These presentations summarize key monitoring results and adaptive management actions we've taken and are designed to encourage meaningful discussion of results among parties. To Support the above statement, a presentation on 2025 socio-economic monitoring results we provided to the SEMWG in April 2026 is attached (Appendix HofK 03_TC66).

6.3 HofK #04 (TC66)

HofK Comment & Request/Recommendation

- Kugluktuk emphasizes that community impacts are most often experienced through cumulative and repeated activities over time, such as seasonal shipping patterns, workforce rotations, and the combined effect of incidents on harvesting confidence. The Annual Report would benefit from clearer multi-year trend analysis demonstrating how conclusions are reassessed as regional activity persists and evolves.
- Request: clearer cumulative effects discussion using multi-year trend analysis relevant to communities.

B2Gold Response

- Multi-year trend analysis is an important component of any long-term socio-economic monitoring program. For this reason, B2Gold Nunavut includes a summary 'Trend Table' at the beginning of all our Socio-Economic Monitoring Reports (see Pages v to vii in the 2025 Socio-Economic Monitoring Report) highlighting indicator: (1.) Pre-development trends; (2.) Post-development trends; and (3.) Trends since the previous year. Further discussion of pertinent multi-year trends is also provided throughout the report where relevant. While cumulative economic effects from the Mine (for the years 2018 to 2025) are presented in Section 11.1.1. It is important to note that the process of socio-economic monitoring may require many years of data to effectively discern some trends and their associated causes. Various factors can influence trend causality, and these may not be easy to individually measure or confirm. Successful socio-economic monitoring for the Mine will require appropriate long-term data, the regular input of Mine stakeholders, and a focus on continuous improvement.

6.4 HofK #05 (TC66)

HofK Comment & Request/Recommendation

- The Municipality recognizes the Project's positive contributions through employment, training, and community investment. At the same time, Kugluktuk requests clearer acknowledgement of community-level barriers and pressures, including housing, childcare, and local **support capacity, that affect residents'** ability to participate in Project benefits.
- Request: clearer discussion of local barriers and coordination with communities to address pressures.

B2Gold Response

- B2Gold Nunavut acknowledges that various community-level barriers and pressures may affect some residents' ability to participate in Mine benefits, including those pertaining to housing, childcare, and local capacity. Such barriers are regularly identified in our annual Socio-Economic Monitoring Reports, with references made to recent research and statistics where available. Pertinent barriers to employment are also identified through our community engagement program and through our bi-annual Inuit Personnel Survey, the next version of which is scheduled to be offered in the Fall of 2026. B2Gold Nunavut also remains open to further discussion with communities on how these barriers can be best addressed. We regularly meet with the Kitikmeot Inuit Association, community organizations, and government agencies on this topic. For example, the Company's recent investment of \$10 million to support the building of new public housing units across all Kitikmeot communities was a result of ongoing concerns raised by communities about housing availability in the Kitikmeot Region. Likewise, B2Gold Nunavut's Kitikmeot Social Investment Program (KSIP) accepts applications on an ongoing basis for community-identified projects with positive multi-year impacts. Further, B2Gold Nunavut entered into discussion with the Hamlet of Kugluktuk about training program partnerships that can be delivered in-community to support both Goose Mine employment needs and Hamlet workforce needs.

6.5 HofK #06 (TC66)

HofK Comment & Request/Recommendation

- For Kugluktuk, effects on traditional activities include both environmental outcomes and harvesting confidence, including perceived safety and access. The Municipality requests clearer explanation of how community observations and Inuit knowledge are incorporated into monitoring interpretation and adaptive management, particularly where marine logistics may affect harvesting decisions.
- Request: clearer integration of community observations and Inuit knowledge into monitoring and adaptive management discussions.

B2Gold Response

- Community perspectives and Inuit Knowledge (IK) are considered throughout the Mine's socio-economic monitoring program. B2Gold Nunavut has developed the document 'Guidance for Incorporating Community Perspectives and Inuit Knowledge in the Goose Mine's Monitoring Programs' to assist in addressing this topic and when preparing its annual monitoring reports. Community perspectives and IK were first considered in the identification of Valued Socio-Economic Components (VSECs) and the assessment of Mine effects in the Final Environmental Impact Statement (FEIS); these effects subsequently became a focus of B2Gold Nunavut's Socio-Economic Monitoring Program (SEMP). FEIS Volume 3 (Public Consultation and Traditional Knowledge) and Volume 8 (Human Environment) provide additional details on how community perspectives and IK were incorporated into Mine baseline information, selection of VSECs, effects assessments, and mitigation and monitoring plans. Sources of information included community consultation records for the Mine, IK studies completed by KIA, and other land use and socio-economic research that was conducted. B2Gold Nunavut also presented early versions of the SEMP for stakeholder review and comment. B2Gold Nunavut committed to presenting socio-economic monitoring results to the KSEMC and SEMWG at least annually. The Company's Community Engagement Plan (CEP) further outlines how Kitikmeot Region communities and local Hunters and Trappers Organizations (HTOs) are kept informed about the Mine, including results of its monitoring programs. The Mine's Inuit Environmental Advisory Committee (IEAC), established in 2023, also continues to be engaged by B2Gold Nunavut. Feedback received from these parties is considered and addressed by B2Gold Nunavut, as appropriate. In addition, a 5-year Harvest Study commenced in 2026 with local land users from Cambridge Bay, Kugluktuk, Bathurst Inlet, and Bay Chimo. This study will help inform B2Gold Nunavut of harvesting activities occurring around the Mine and provides an opportunity for harvesters to share observations and provide feedback to the Company. Recent community perspectives related to the socio-economic monitoring program are included throughout the Socio-Economic Monitoring Report (see the 'Community Perspectives' sections of the report) and have informed its conclusions. In addition, a summary of recent (i.e. 2025) community feedback received on the Mine, including B2Gold Nunavut's responses to it, was included in Appendix B. The role community perspectives and IK have played in B2Gold Nunavut's adaptive management of the Mine is summarized in Section 11.2.

6.6 HofK #02 (TC89)

HofK Comment & Request/Recommendation

- The Annual Report references emergency and spill response planning, but does not clearly describe coordination, notification protocols, or capacity assumptions for affected communities such as Kugluktuk. While incidents may be low-probability, they can be high-impact for communities. Kugluktuk requests clarification on how communities are notified during marine or regional incidents, and how emergency planning ensures municipal resources are not relied upon without prior agreement.
- Request: Provide clarification on notification protocols, coordination mechanisms, and municipal capacity assumptions.

B2Gold Response

- B2Gold has developed and implemented an incident command system in case of emergency spill. The Notifications/calls are done by a member of the site response coordinator and Communities are informed by B2Gold Indigenous and Northern Affairs Group/Department. B2Gold does not anticipate relying on municipal resources, however, should the needs arise, B2Gold will ensure agreement are in place with the Municipality.

7. KIA (NIRB DOC. ID# 361833)

B2Gold Nunavut acknowledges comments from the Kitikmeot Inuit Association (KIA) and has provided the requested information in the following sections.

7.1 KIA #01 (TC1)

KIA Comment & Request/Recommendation

- In the main text, it is stated: “Monitoring (e.g., continuous, etc., examples) will be the principal mechanism by which the effectiveness of this Plan is determined.” The examples provided are difficult to understand and may contain a typo.
- Recommendation: The KIA requests the following: Please rewrite this sentence to make it easier to understand.

B2Gold Response

- The typo is noted. The sentence should read ‘Continuous and passive air quality monitoring results will be the principal mechanism by which the effectiveness of this Plan is determined’.

7.2 KIA #03 (TC1)

KIA Comment & Request/Recommendation

- Considering that the predominant wind directions are from north to south and from west to east, based on data from the Goose station, please clarify why all monitoring stations are located southeast of the Goose Plant Site. This placement may miss pollutants transported to the south and east. If the stations were selected based on these wind directions, averaging the wind directions may produce misleading results by missing high concentrations in both downwind directions. Please also clarify why there are no monitoring stations on the east side of the pile.
- Recommendation: The KIA requests the following:
 - Please clarify the criteria used for locating passive and dustfall stations.
 - Given that some exceedances are being measured already (see next comment), are the opportunities to add or adjust locations given that there is now more data on predominant wind direction than when the plan was developed?

B2Gold Response

- The dustfall and passive air quality monitoring transect was originally installed prior to the construction phase of the Project with the intention of monitoring air emissions pre-construction, through construction and then into operations. Based on observed wind data at Goose station (e.g., see Figure TC8-8 in the annual report), winds from the west to north wind sector are all relatively common on an annual-basis, therefore the transect was orientated to the southeast to try to maximize downwind time from major Project activities. However, when establishing the transect, common wind patterns was not the only factor in the decision. The location of current and expected construction activities, and the Final Environmental Impact Statement (FEIS) air dispersion modelling results (Sabina 2015) were also determinants in the citing decision. When the transect was installed, nearby crushing activities, haul road traffic, and construction of Goose Plant Site and stockpile pad were the major on-site activities occurring with impacts on air quality. The FEIS modelling of air quality impacts during operations also predicted elevated

dust deposition rates and NO₂ concentrations southeast of the Goose Plant Site area, confirming that citing a transect southeast of Goose Plant Site area was favourable. It should be noted that although westerly winds may be common annually, as pointed out in the review comment, westerly winds are not common during the summer months of June, August and September when dust emissions are expected to be at their greatest (see Figure TC8-10 in the annual report). As such, having a west-east transect is less ideal. Since the current transect has been in place since the Project's pre-construction phase, it should not be moved to another location as comparisons between previous phases could no longer be performed. However, B2Gold is evaluating adding an additional transect or transects to monitor releases from mining operations near Llama and Umwelt pit to complement the monitoring currently done closer to the Goose Plant Site area, as well as to get a better understanding of air quality impacts near the Project Development Area.

7.3 KIA #02 (TC2)

KIA Comment & Request/Recommendation

- In the table, the annual standard for PM_{2.5} is stated as 8 µg/m³; however, on the CCME website, the actual standard is listed as 8.8 µg/m³: <https://ccme.ca/en/air-quality-report>.
- Request: The KIA requests the following: Please revise the standard used to match the official standard.

B2Gold Response: The updated table is provided below and the correct annual PM_{2.5} CAAQS will be used in future reports.

Table 4.1-1: Relevant Ambient Air Quality Standards and Guidelines

Contaminant	Averaging Period	NAAQS and CAAQS ^(a)	Previous NAAQS ^(b)	Air Quality Criteria from Other Jurisdictions
Nitrogen dioxide (NO ₂)	1-hour	42 ppb ^(c)	213 ppb	—
	24-hour	—	106 ppb	—
	Annual	12 ppb	32 ppb	—
Coarse Particulate Matter (PM ₁₀)	24-hour	—	—	50 ^(d)
Total Suspended Particulate (TSP)	24-hour	—	120 µg/m ³	—
	Annual	—	60 µg/m ^{3(e)}	—
Fine Particulate Matter (PM _{2.5})	24-hour	27 µg/m ^{3(f)}	30 µg/m ³	—
	Annual	8.8 µg/m ^{3(g)}	—	—
Dust deposition	30-day	—	—	53 (158) ^(h)

Notes:

“—” = no applicable standard; “CAAQS” = Canadian Ambient Air Quality Standards; “NAAQS” = Nunavut Ambient Air Quality Standards.

^a The NAAQS and CAAQS 2025 standards (CCME 2025; ENV 2023). ^b The 2011 NAAQS (ENV 2011). ^c The 3-year average of the annual 98th percentile of the daily maximum 1-hour average concentrations. ^d British Columbia Air Quality Objective (BC MOEP 2021). ^e Geometric mean. ^f The 3-year average of the annual 98th percentile of the daily 24-hour average concentrations. ^g The 3-year average of the annual average of the daily 24-hour average concentrations.

^h Alberta Ambient Air Quality Guidelines for dustfall in residential and recreational areas, and industrial and commercial areas, in brackets (AEPA 2024).

7.4 KIA #04 (TC2)

KIA Comment & Request/Recommendation

- While the AQMMP report includes some mitigation measures for fugitive dust, no information could be found on how elevated NO₂ concentrations would be controlled. Additionally, for dustfall, PM_{2.5}, and PM₁₀, the exact sources of the pollutants are not clearly identified, so it is unclear how those mitigation measures would be applied.
- Request: The KIA requests the following: As pollutant concentrations exceed the applicable standards in some cases, please clarify, for each case, what mitigation measures will be applied to prevent similar exceedances in the future.

B2Gold Response

To better understand the emission sources that contributed to exceedances observed in 2025, B2Gold is planning to update the Final Environmental Impact Statement (FEIS) air dispersion modelling results (Sabina 2015). The updated predictions will help inform which sources have the greatest potential impact on monitored concentrations. Mitigation and adaptive management measures will then be implemented to target the predicted problem sources. In the interim, the following measures will be implemented by B2Gold:

- Measures to mitigate or assess fugitive dust emissions, which were suspected to have contributed to 2025 Group (1) and (3) PM₁₀ exceedances summarized in Table TC2-7:
 - Increase road watering frequency during dry summer months and evaluate applying chemical dust suppressants in problem areas.
 - Assess whether speed limits on haul roads around Goose Plant Site area need to be reduced to lower road dust emissions.
 - Compare monitoring results year-over-year to evaluate trends now that construction activities have slowed down and there is expected to be less fugitive dust emissions near Goose Plant Site area.
- Measures to improve monitoring of wildfire smoke impacts, which were suspected to have contributed to 2025 Group (2) and (3) PM_{2.5} and PM₁₀ exceedances summarized in Table TC2-7:
 - Begin documenting wildfire smoke observed on-site (either visually or by smell) in a log that would include the date and time smoke was observed, and pictures of the smoke (if applicable).
- Measures to improve monitoring and mitigation of incinerator air emissions, which were suspected to have contributed to the 2025 Group (4) PM_{2.5} exceedance observed at Hill Meteorological Station summarized in **Table TC2-7**:
 - Begin formal monitoring of incinerator plume when incinerators are operating. The formal monitoring would consist of documenting hourly whether exhaust smoke is visible, and if so, the direction it is headed. If there is visible smoke, actions to improve incinerator combustion will be performed immediately and documented. If the plume visibly appears to be impacting worker accommodation, incineration activities will be stopped upon completion of the batch and will only be restarted when incinerator combustion issues are diagnosed and resolved.
- Measures to mitigate NO₂ emissions to address CAAQS and WHO AQG exceedances around worker accommodations:

- Evaluate relocating large diesel generators away from the Goose Main Camp to help reduce ground-level NO₂ concentrations measured at the camp in 2025. If moving the generators is not feasible, emission control technologies that can be retrofitted will be assessed and/or modification to generator stack design (e.g., increasing stack height).
- Implement a no-idling policy that targets idling around camps.
- Replacing old mobile equipment with new Tier 4 Final certified equipment to reduce emissions from the mobile fleet.
- Continuing planning work related to the Back River Project Energy Centre, a proposed wind generation facility, solar array, and Battery Energy Storage System (BESS), which would reduce the need for diesel-fired generators.

7.5 KIA #05 (TC2)

KIA Comment & Request/Recommendation

- On page 4-24 it is stated: “It should be noted that the Kunak PM sensor is a lower grade sensor in comparison to the T640; the T640 exceeds the US EPA Class III Federal Equivalent Method (FEM) PM_{2.5} mass concentration requirements and is rated for temperatures as low as -40°C, whereas the Kunak PM sensor is only rated to -10°C and does not meet the US EPA Class II FEM criteria.” As this sensor does not meet EPA criteria, it is unclear why it was not replaced with a more reliable sensor.
- Request: The KIA requests the following:
 - Please clarify why the sensor used at the Kunak station was not replaced with a more reliable sensor that is better suited to the climatic conditions in the study area.
 - Please replace the sensor with one appropriate to climate conditions in the Arctic.

B2Gold Response

- The T640 continuous monitor located at the Goose AQ Station is intended to be the primary continuous monitor for PM_{2.5} and PM₁₀. Although the Kunak’s have a PM sensor, the results are only intended to be used to supplement T640 data and access spatial differences between concentrations near Goose Plant Site and at Goose Exploration Camp. This comparison is useful during dusty or smoky summer periods when temperatures are above the Kunak’s PM sensor -10°C rating. The primary purpose of the Kunak sensors is to monitor NO and NO₂ continuously without the need for a climate-controlled shelter with expensive monitoring equipment that also requires additional maintenance. The Kunaks’ NO and NO₂ monitoring performance was considered good based on the 2025 monitoring results. The 2025 Kunak Air Lite monitors at both stations will be replaced with Air Pro versions in 2026. With the Kunak Air Pro, calibration tests can be completed on-site which will help improve the validation of monitoring data, reduce downtime during recalibration, and have the added benefit of an upgraded particle sensor for monitoring PM_{2.5} and PM₁₀ that is certified by the United Kingdom Environmental Agency’s Monitoring Certification Scheme (MCERTS).

7.6 KIA #06 (TC2)

KIA Comment & Request/Recommendation

- Based on Table TC2-10, it seems that most of the exceedances occurred during July and August. However, the wind rose charts indicate that the predominant wind direction in July was from the

north, and in August from the north and southwest. These wind directions do not seem to place the Goose AQ station directly downwind of the likely source areas.

- Most of the exceedances occurred in July and August, when the wind direction was not toward the Goose station. Therefore, we would suspect that pollutant concentrations may have been even higher in other areas.
- Recommendation: The KIA requests the following:
 - Please clarify whether pollutant concentrations may have been higher in other downwind areas that were not monitored.
 - Use the monitoring results and consider whether additional monitoring locations should be added.

B2Gold Response

- Frequent wind directions is not an indicator of higher maximum ground level concentrations itself. The exceedances summarized in Table TC2-10 are based on a 24-hour averaging period when winds could be substantially different than the monthly wind pattern. Moreover, most of the July and August exceedances, i.e., Exceedance Group (2) in Table TC2-10, appear to have been primarily related to regional wildfire smoke and not Project sources as discussed in the annual report. Pollutant concentrations will vary throughout the Project area; the concentrations monitored at the Goose AQ Station and at the Hill Meteorological Station only represent the conditions at those stations. The intent of air quality monitoring is to help assess the air quality impacts of the Project and the need for mitigation and adaptive management measures. An example is comparing monitoring data with FEIS predictions and baseline data to assess whether impacts are greater than expected, which may justify further investigation. The intent of the air quality monitoring program is not to determine peak concentrations. It is also worth pointing out that the ambient air quality criteria presented in Table TC2-2 of the report apply at the fenceline of the Project, which is kilometres further away from the Goose AQ Station and Hill Meteorological Station. It is noted that the FEIS predictions, mentioned in the previous paragraph, are outdated as the as-built configuration of the plant site and operational activities have since changed. As such, B2Gold is planning to perform an updated air dispersion modelling assessment in 2027, which will help better assess problem areas, and provide more accurate predictions to compare monitoring results to. The predictions will also be used to assess if other monitoring locations are necessary and whether to relocate the existing Goose AQ Station.

7.7 KIA #07 (TC2)

KIA Comment & Request/Recommendation

- On Page 4-26, wildfires are identified as one potential reason for the PM_{2.5} exceedances for Group 2 and Group 3; however, the report does not provide sufficient supporting evidence. This type of attribution should be supported by real-time data, such as regional monitoring results or observations from nearby stations, rather than assumptions. On the same page, it is stated: “Wildfires were burning in the Northwest Territories during these dates (NRCan 2026) and based on historical Ozone Mapping and Profiler Suite (OMPS) aerosol index data, there was smoke near the Project on or around these dates (NASA 2026). Wildfire smoke therefore was likely the cause of these exceedances.” The assessment should provide additional site and time-specific evidence, such as wind direction, nearby air quality data (if available), and pollutant trends before and after the exceedance events.

- **Recommendation:** The KIA requests the following:
 - Please justify the claims regarding the impact of wildfires on air quality using real data, such as wind direction on those specific days and the locations of the wildfires.
 - Please also provide this information for the day before and the day after each exceedance.
 - Please add a map showing OMPS data around the Project area, including areas of elevated smoke.

B2Gold Response

For Group 2 and 3 exceedances, regional fire smoke was attributed to be the main factor or a major factor for the following reasons:

- Concentrations of PM_{2.5} and PM₁₀ were both elevated at both Goose AQ Station and Hill Meteorological Station. The Hill Meteorological Station is over 4 kilometres away from Goose AQ Station and it does not have any active mining or processing activities nearby. For both stations to have elevated concentrations at the same time, it suggests there was a regional effect influencing conditions (e.g., wildfires). The daily ratio between PM_{2.5} and PM₁₀ during Group 2 exceedances were notably higher than normal (greater than 0.61 compared to an annual average of 0.36 at the Goose AQ Station T640). The Group 3 exceedance PM_{2.5} and PM₁₀ ratio for the day was close to normal (0.32) but during the morning hours between 00:00 and 08:00, the ratio was greater than 0.77. A higher PM_{2.5} and PM₁₀ indicates that a combustion source, such as a wildfire, was impacting concentrations. Using the Fire Information for Resource Management System (FIRMS) US and Canada interactive FIRE MAP historical OMPS aerosol index data (NASA 2026a) and NASA's Worldview Snapshots historic satellite imagery (NASA 2026b), smoke plumes in or near to the Project were identified during the day of the exceedance. Further discussion for each Group 2 and 3 exceedances is provided below:
- **July 18, 2025, exceedance:**
 - The FIRE MAP showed a substantial smoke plume in eastern NWT, directly south of the Project (Figure 1 below). Looking at the Worldview Snapshots imagery on that day, wildfire smoke can be seen near the project, although there is significant cloud cover above the Project making it difficult to see the smoke at the actual Project location (Figure 2 below). This cloud cover may explain why the OMPS aerosol index data did not show a plume above the Project that day.
 - Wind directions at Hill Meteorological Station varied throughout the day, although there were 12 consecutive hours where the wind direction was between 150 to 260 degrees, which would put the Project downwind of the visible smoke plume to the south and active wildfires near Great Slave Lake to the southwest.
- **July 30, 2025, exceedance:**
 - The FIRE MAP showed substantial smoke plumes in western Nunavut around the Project (Figure 3 below). The Worldview Snapshots imagery clearly shows smoke where the Project is located (Figure 4 below).
 - Further analysis of wind direction is not necessary as wildfire smoke is clearly visible in the Worldview Snapshots imagery.
- **July 31, 2025, exceedance:**
 - The FIRE MAP showed the previous day's smoke plumes converging together further south in eastern NWT south of the Project (Figure 5 below). The Worldview Snapshots imagery shows smoke over eastern NWT south of where the Project is located (Figure 6 below).

- Wind direction at the Hill Meteorological Station during the morning hours were from the southwest to west wind sector, before transitioning to being from the north-northwest to north, likely moving the previous day's smoke further south.
- **August 4-5, 2025, exceedances:**
 - The FIRE MAP showed substantial smoke plumes in eastern NWT south of the Project on August 4 and over the Project on August 5 (Figure 7 below). Both August 4th and 5th Worldview Snapshots imagery are obstructed by cloud cover, however, smoke can be seen in eastern NWT right up to its northern border with Nunavut on August 4 (Figure 8 below).
 - Further analysis of wind direction is not necessary as wildfire smoke is clearly shown to be over the Project on August 5 and can be seen in the Worldview Snapshots imagery.
- **September 3, 2025, exceedance:**
 - The FIRE MAP does not show any plumes on September 3 based on OMPS Aerosol Index data, however, the day prior, there are scattered plumes near Bathurst Inlet (Figure 9 below). The Worldview Snapshots for September 3 is obstructed by heavy cloud cover, but the imagery from September 2, shows wildfire smoke in the NWT up to the northern Nunavut border where cloud cover obstructs it (Figure 10 below).
 - The wind was between the southwest and west during the morning hours when concentrations were at their greatest, which would put the Project downwind of wildfire smoke observed in the September 2 Worldview Snapshots imagery and of fire hot spots in the NWT.

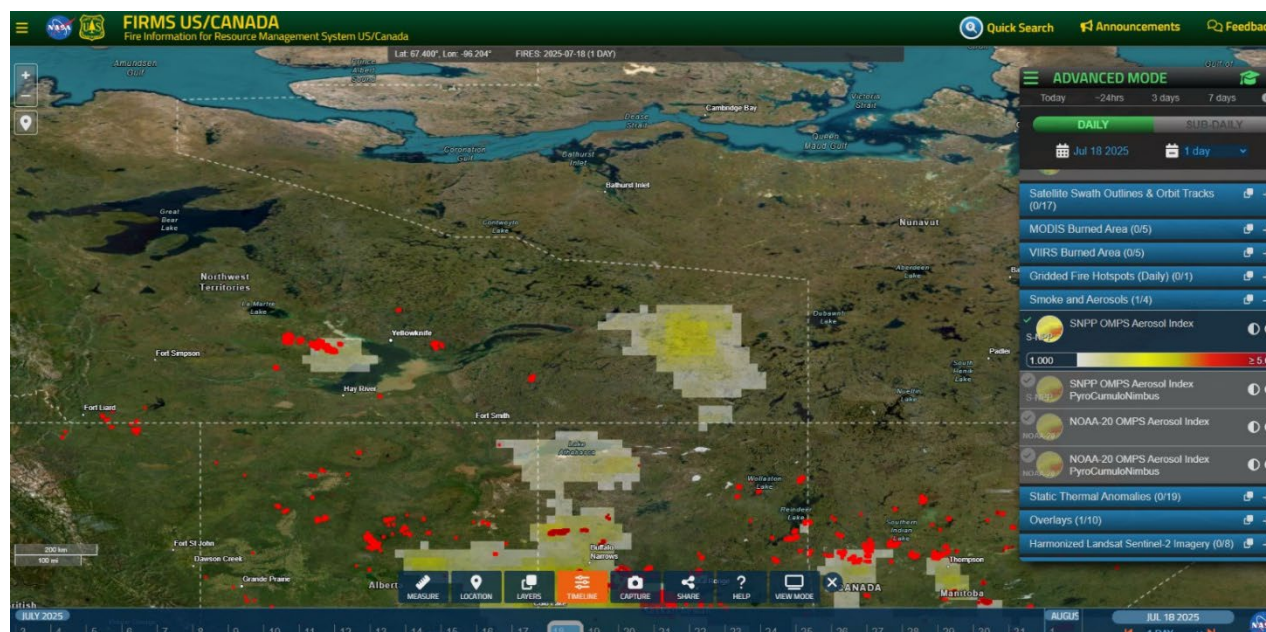


Figure 1: FIRE MAP Historical Aerosol Index Data Screenshot – July 18, 2025

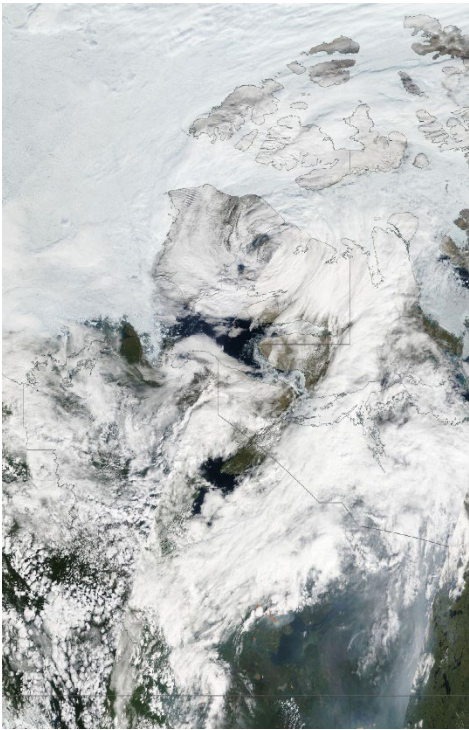


Figure 2: Worldview Snapshot – July 18, 2025

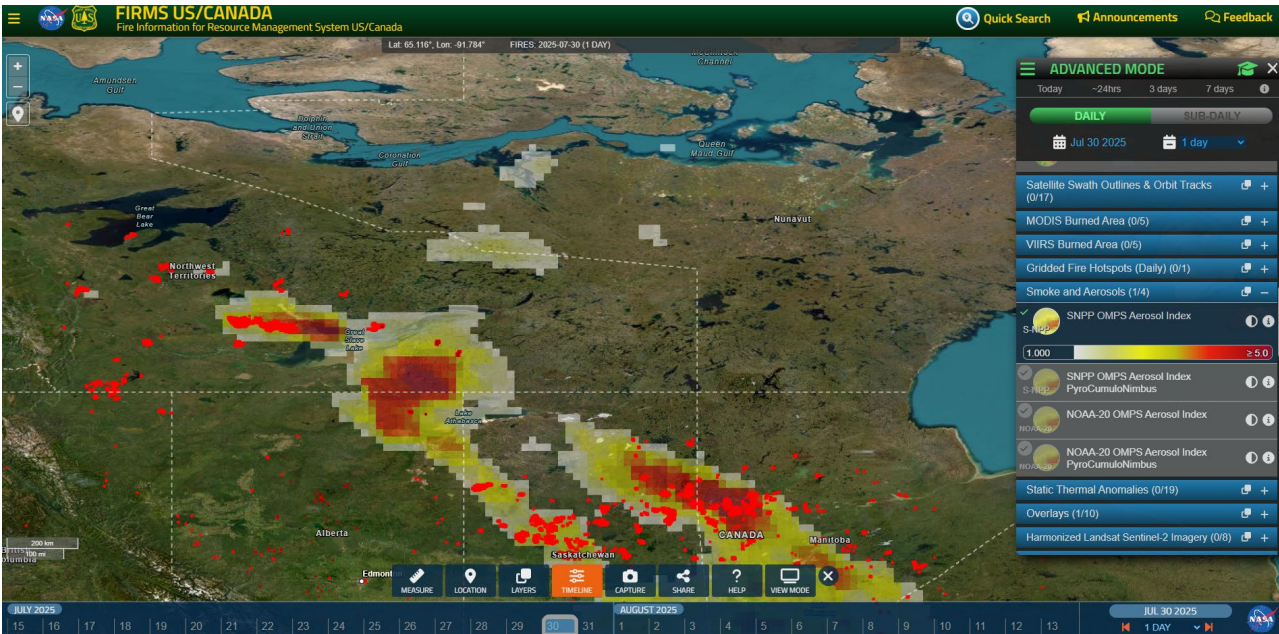


Figure 3: FIRE MAP Historical Aerosol Index Data Screenshot – July 30, 2025

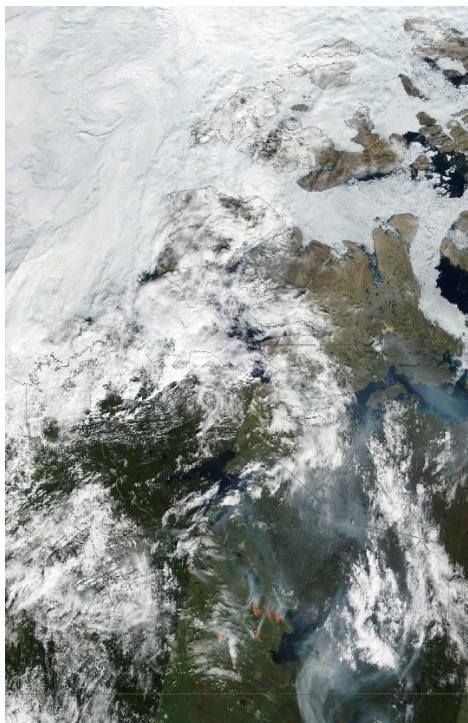


Figure 4: Worldview Snapshot – July 30, 2025

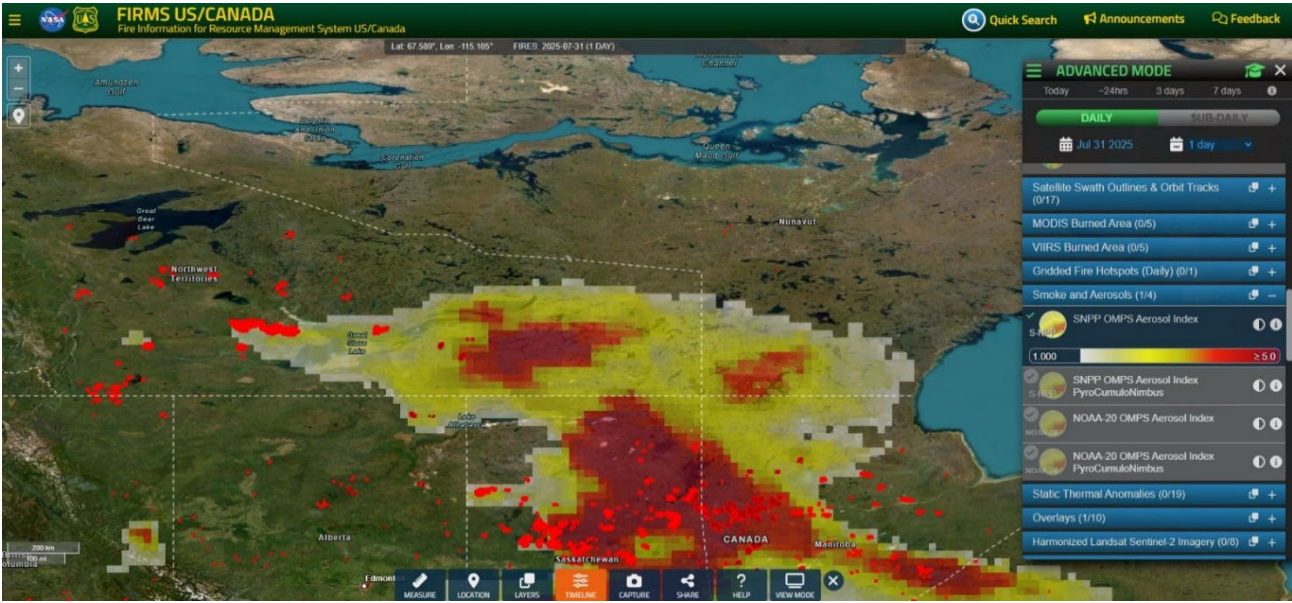


Figure 5: FIRE MAP Historical Aerosol Index Data Screenshot – July 31, 2025



Figure 6: Worldview Snapshot – July 31, 2025

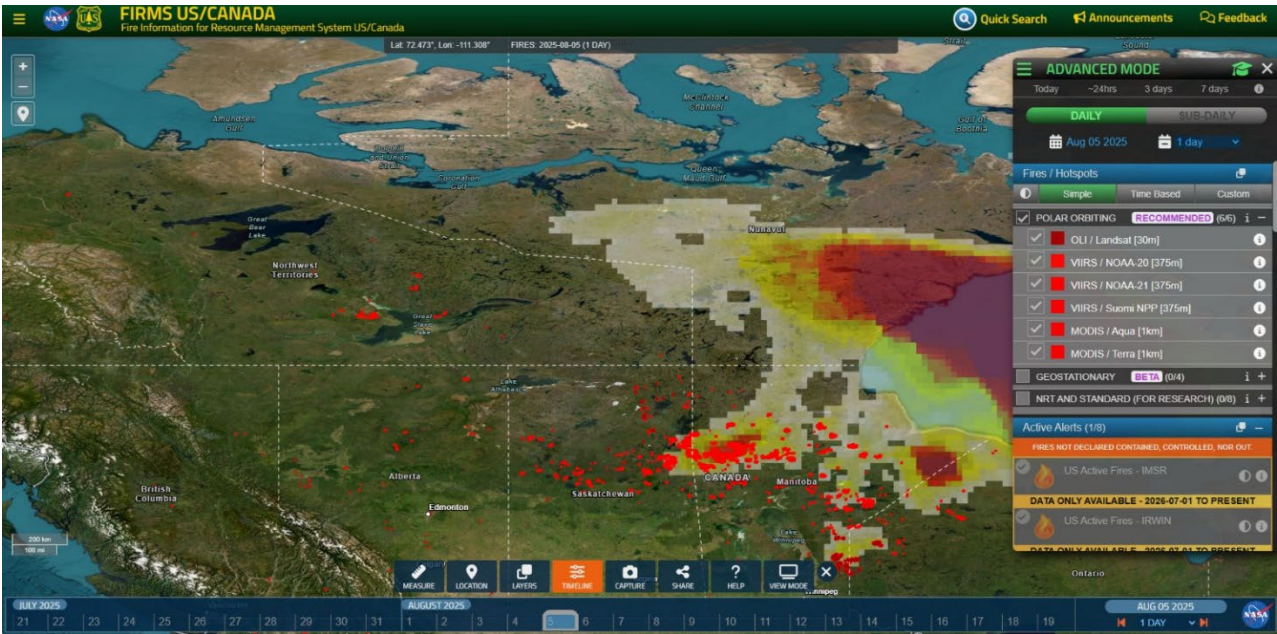


Figure 7: FIRE MAP Historical Aerosol Index Data Screenshot – August 5, 2025

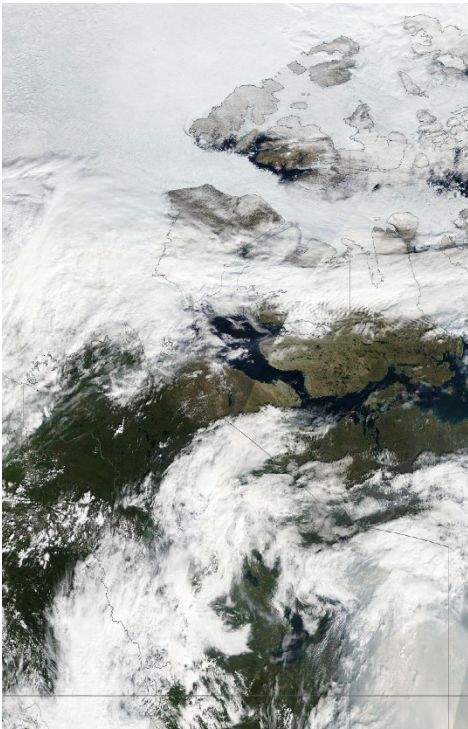


Figure 8: Worldview Snapshot – August 4, 2025

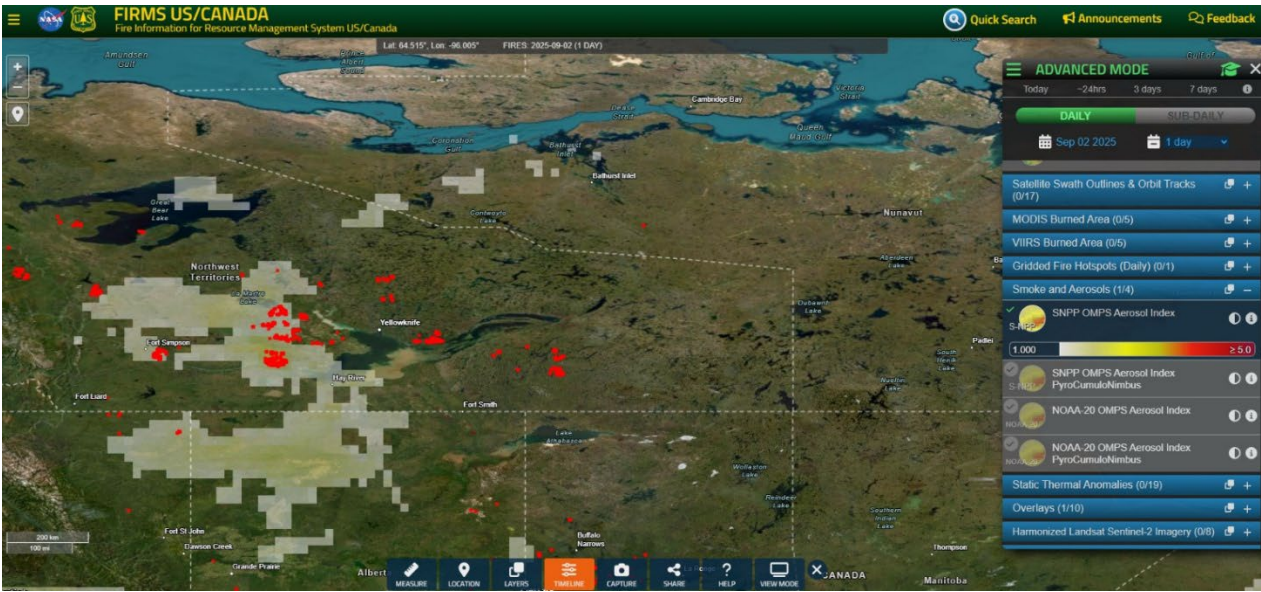


Figure 9: FIRE MAP Historical Aerosol Index Data Screenshot – September 2, 2025

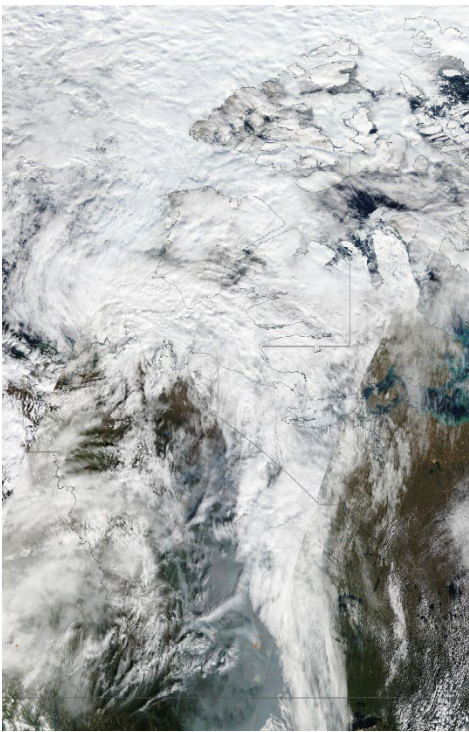


Figure 10: Worldview Snapshot – September 2, 2025

7.8 KIA #08 (TC2)

KIA Comment & Request/Recommendation

- On Page 4-32, it is stated: “Since the only observed continuous NO₂ exceedances were related to CAAQS or a surrogate to CAAQS (i.e., WHO AQG), which is intended to be used for regional airshed management and not to assess project effects (CCME 2020), further investigation into the exceedances to evaluate the need for mitigation measures or additional monitoring was not warranted, and therefore not completed.”
- The conclusion that “therefore no follow-up was warranted” is not sufficiently justified. While CAAQS and WHO AQG may not function as project-specific regulatory limits, exceedances of health-based ambient air quality benchmarks still warrant interpretation in the context of Project contribution, background conditions, receptor sensitivity, and uncertainty. Although CAAQS are generally assessed using three years of data, observed elevated NO₂ levels should not be dismissed without further evaluation, particularly where they may indicate potential adverse health concerns or the need for mitigation or additional monitoring.
- Request: The KIA requests the following: Please provide a follow-up evaluation of the observed elevated NO₂ levels. The evaluation should determine whether mitigation measures, source-specific controls, or additional monitoring are required. Where no further action is proposed, please provide a clear technical rationale supported by monitoring data.

B2Gold Response

- To help identify potential sources that were contributing to the elevated NO₂ concentrations, a wind direction analysis was performed, which consisted of plotting hourly NO₂ concentrations versus wind direction (see Figures 1 and 2) and summarizing the number of CAAQS hourly NO₂ (42 ppbv) exceedances per wind direction (see Table 1).

The majority of Goose AQ station CAAQS hourly NO₂ exceedances occurred when the wind was from the north-northwest to north-northeast wind sector. As noted in the annual report, there are three large diesel generators 150 m north of the Goose AQ Station, and therefore it is strongly suspected that those generators are the main cause of elevated NO₂ concentrations monitored at Goose AQ Station. When Goose AQ Station was downwind from the adjacent camp buildings (i.e., between northeast to southeast), Goose AQ Station NO₂ concentrations also were sporadically elevated in comparison to concentrations measured when the station was downwind of the tundra towards the west. This is expected as there are multiple small diesel heaters that are used around the camp, and there is also an access road used by mobile equipment directly to the east of the Goose AQ Station. The majority of hourly NO₂ CAAQS exceedances at the Hill Meteorological Station occurred when the station was downwind of the Exploration Camp (i.e., west to northwest winds) where there are multiple diesel fuel combustion sources associated with powering and heating the camp. Elevated NO₂ concentrations also were measured occasionally when the Hill Meteorological Station was downwind of the waste incinerator (i.e., southerly winds).

B2Gold agrees that more follow-up measures are needed to investigate and address the elevated NO₂ concentrations monitored in 2025 near worker accommodations. The following measures are planned:

- Updating the Final Environmental Impact Statement (FEIS) air dispersion modelling results (Sabina 2015) with as-built emission sources to better understand where air quality impacts are predicted to be the greatest and to also identify the main source contributors to those impacts.

- Evaluating whether the three camp generators north of the Goose AQ Station can be relocated, and if not, whether emission control technologies can be retrofitted.
- Exploration Camp is planned to be decommissioned and the date will be communicated in due course. In the interim, monitoring of NO₂ will continue to be conducted at the Hill Meteorological Station to assess whether concentrations are posing a risk to workers staying at the camp. Additional passive NO₂ monitoring at Exploration Camp accommodation receptors is also being evaluated.
- Implement a no-idling policy that targets idling around camps.
- Replacing old mobile equipment with new Tier 4 Final certified equipment to reduce emissions from the mobile fleet.
- Replacing the current incinerator with a new permanent incinerator. The new incinerator will be stack tested to better understand emissions.
- Continuing planning work related to the Back River Project Energy Centre, a proposed wind generation facility, solar array, and Battery Energy Storage System (BESS), which would reduce the need for diesel-fired generators.
- Replacing the 2025 Kunak Air Lite monitors at both stations with Air Pro versions in 2026. The Kunak Air Pro can be calibrated on-site which will help improve the validation of monitoring data and reduce downtime during recalibrations.

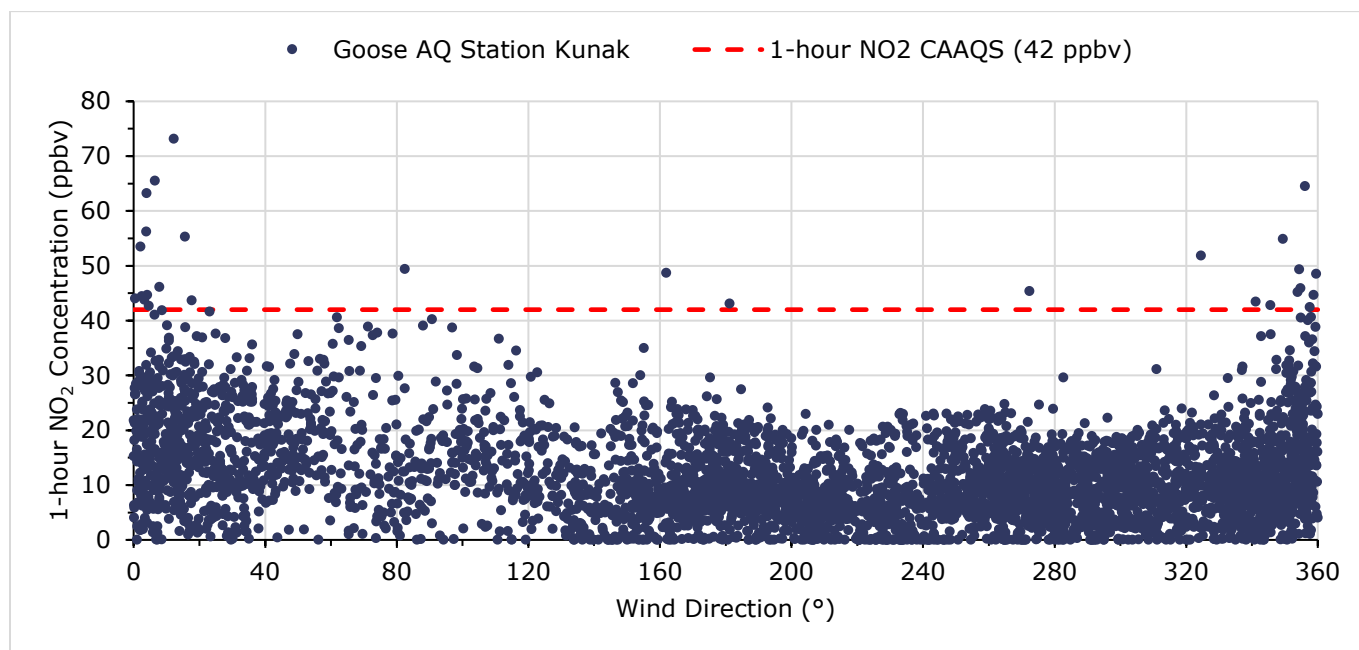


Figure 1: Goose AQ Station Kunak 2025 Hourly NO₂ Concentrations Versus Wind Direction

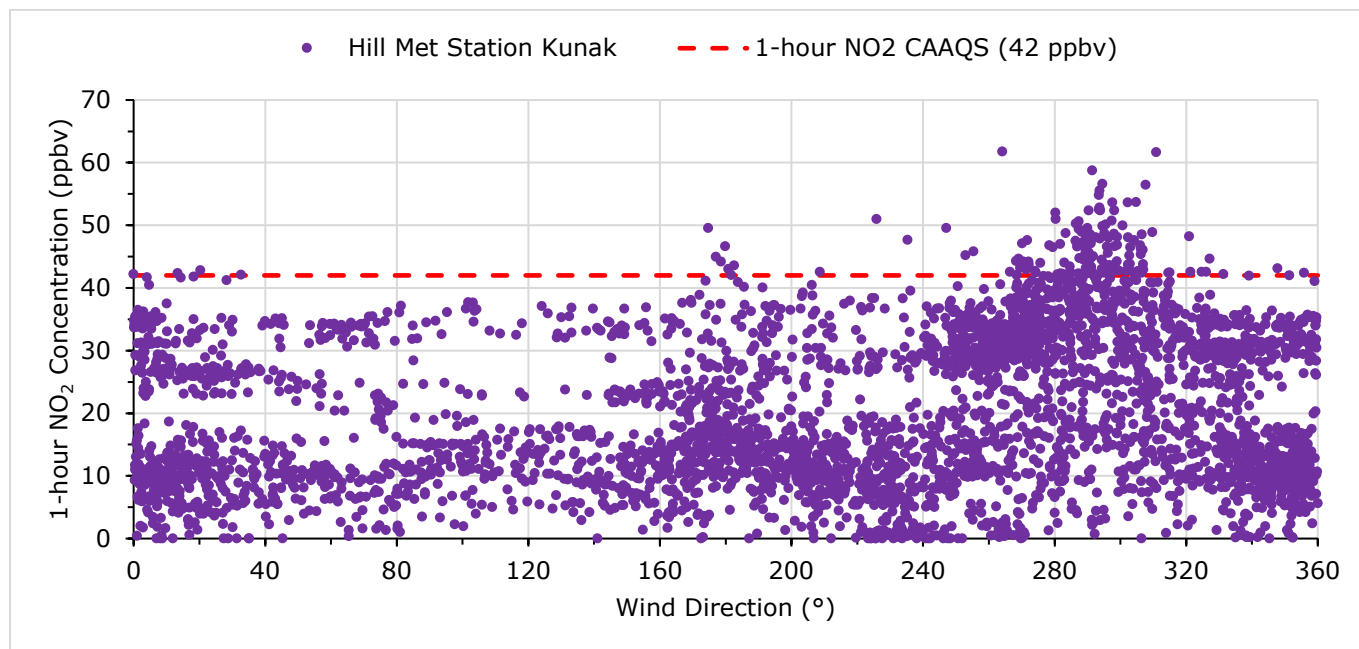


Figure 2: Hill Meteorological Station Kunak 2025 Hourly NO₂ Concentrations Versus Wind Direction

Table 1: NO₂ Hourly CAAQS Exceedances by Wind Direction

Direction	Number of Hours NO ₂ > 42 ppbv (CAAQS)	
	Goose AQ Station	Hill Meteorological Station
North	18	3
North-northeast	3	3
Northeast	0	0
East-northeast	0	0
East	1	0
East-southeast	0	0
Southeast	0	0
South-southeast	1	0
South	1	7
South-southwest	0	1
Southwest	0	2
West-southwest	0	3
West	1	21
West-northwest	0	79
Northwest	1	22
North-northwest	2	3
Unknown ^(a)	0	41
Total	28	185

"CAAQS" = Canadian Ambient Air Quality Standards; "NO₂" = nitrogen dioxide; "ppbv" = parts per billion volume basis.

^(a)The wind direction is unknown for some exceedances due to the wind sensor being frozen by ice accumulation.

7.9 KIA #09 (TC6)

KIA Comment & Request/Recommendation

- On page 4-47 it is stated: “Total annual GHG emissions have increased in 2025 in comparison to 2024. This increase is largely attributed to an increase in diesel consumption as the Project entered its operation phase in 2025.” However, without more information about the 2024 estimates, this comparison is difficult to interpret.
- Recommendation: The KIA requests the following:
 - For this comparison, please add the estimated 2024 GHG emissions by adding the amount the total GHG emissions have increased by to the sentence noted.

B2Gold Response

- Tables TC6-1 and TC6-4 from the annual report have been revised below to include 2024 values in addition to 2025 values. Note that George GHG emissions were not quantified in 2024, however, based on 2025 estimates, 2024 George GHG emissions are expected to be negligible (i.e., less than 1% of total Project emissions).

Table TC6-1: Goose Project 2025 Input Data for GHG Estimates

Emission Source Category	Parameter	Unit	2025			2024		
			Goose	MLA	George	Goose	MLA	George ^(a)
Stationary Fuel Combustion	Diesel	L	15,796,637	2,508,790	4,728	7,101,167	367,145	—
	Waste Oil	L	24,780	34,930	0	21,100	—	—
	Propane	L	40,329	481,392	0	116,053	98,901	—
	ANFO Explosives	kg	1,745,501	0	0	1,229,403	0	—
	Emulsion Explosives	kg	801,924	0	0	567,791	20,189	—
On-site Transportation	Diesel	L	8,759,697	2,150,391	564	8,073,807	2,080,488	—
	Jet A ^(b)	L	371,050	5,740	39,360	—	—	—
Waste	Waste Incinerated – Food	kg	187,537	105,070	0	226,351	—	—
	Waste Incinerated – Human Waste	kg	35,575	65,079	0	80,943	—	—
	Waste Incinerated – Misc.	kg	208,472	57,642	0	122,455	—	—
	Total Open Burn Waste	m ³	10,287	73,890	0	5,098	0	—

“ANFO” = ammonium nitrate fuel oil; “kg” = kilogram; “L” = litre; “m³” = cubic metre; “MLA” = Marine Laydown Area; “—” = no data available.

^a George emissions were not quantified in 2024, but are assumed to be negligible in comparison to Goose and MLA emissions.

^b Only includes Jet A volumes used by helicopters operating at the Project, it does not include volumes associated with airplane traffic to and from the Project.

7.10 KIA #49 (TC8)

KIA Comment & Request/Recommendation

- PCC No. 8 states that the proponent shall “monitor local weather and adaptively manage potential impacts from extreme or abnormal weather conditions.” And “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 2025 annual report does provide a summary of meteorological data and the 2025 data from Goose Station are compared with data from the ECCC stations at Lupin and Bathurst Inlet. Considering that several years of local climate data are now available at Goose (since 2004) and MLA (since 2012) comparing annual data with past data would provide more information on outlying weather events than a comparison with the two ECCC stations that are impacted by their own local climate conditions. Specifically, precipitation patterns are different at these locations, and a comparison does not provide sufficient information on potential changes in climate conditions at the project site.
- Request: It is recommended that B2BGold Nunavut complement the Extreme and Outlying Events analysis by comparing the observations of the reporting period with past records from the Goose (Lat. 65.54, Long. 106.41, Elev. 277 m) and MLA (Lat. 66.65, Long. 107.69, Elev. 11 m) weather stations.
- Disagree (KIA does not agree that this condition is in compliance). Similar to last year’s comment, it would be useful to have data from previous years plotted to compare against the reporting period, specifically as the length of the local record keeps growing. However, as currently presented, the information provided in PCC No. 8 does comply with the requirement.

B2Gold Response

A comparison of 2025 Goose Station data with the complete 2004 through 2025 Goose dataset is provided below for temperature, rainfall and wind speed per the recommendation.

The MLA meteorological station is no longer maintained or operating (it was demobilized in 2020), so historical data is not provided here. A comparison with historical MLA data was not completed since MLA climate conditions are considerably different than Goose’s due to the effects the Arctic Ocean has on MLA weather. Large uncertainties could be introduced into meteorological statistics if data completeness is low, therefore the following data completeness requirements were adopted from ECCC (ECCC 2025) for the historical site comparisons:

- Mean temperature: 3 and 5 rule (i.e., no more than 3 consecutive missing data points and no more than 5 missing data points total)
- Extreme max temperature: all available values.
- Total rainfall: 100% completeness.
- Mean wind speed: 90% completeness
- Wind roses: 90% completeness
- Maximum daily rainfall: Totals: all available values.
- Maximum wind speed: all available values.

Temperature:

For temperature comparisons, daily average temperatures were calculated from hourly records at Goose per ECCC methods and then summarized for each month from 2004 through 2025 in Table 1. Extreme temperature recordings from 2004 through 2025 are also summarized monthly in Table 2. Note that in Table 1, the annual average is only presented for years with complete monthly daily average temperature data. A box plot of all complete 2004-2025 daily average temperature data with 2025 averages overlaid is provided in Figure 1.

The 2025 annual daily temperature average (-8.5 °C) is the second highest average on record at Goose Station, the highest being recorded in 2023 (-7.8 °C). The months of September and November 2025 were also the warmest on record, based on daily temperature averages. The only months of 2025 where the daily temperature average was less than the 2004-2025 average were June, July and December. Based on the extreme minimum and maximum monthly temperatures recorded in 2025, all 2025 temperature recordings were within the ranges previously recorded for each month.

Rainfall:

Rainfall comparisons were completed by comparing 2025 totals with the complete Goose dataset in Table 3 and Figure 2. The maximum daily rainfall recorded in 2025 for each month compared to the complete dataset maximums are also summarized in Table 4. Note that for rainfall totals, only months with 100% complete records were included in the analysis per the ECCC methodology (ECCC 2025)¹. For annual totals, if May through October data were complete (i.e., the months where rainfall normally occurs), the annual total is presented regardless of whether November through April data missing data as rainfall generally only occurs between May and October at Goose Station.

Total rainfall recorded in 2025 (197.3 mm) was higher than the rest of recorded years except for 2023 (216.4 mm). Rainfall totals during the months of May, June and November in 2025 all exceeded previous monthly maximums. There was also one day in 2025 where the total daily rainfall recorded exceeded the previous recorded maximum; on May 27, 2025, 15.9 mm of rain was recorded at Goose Station which exceeds the previous May maximum daily total of 5.6 mm measured on May 30, 2021, and May 8, 2024

¹ data that was removed due to station maintenance activities are not considered missing records as it was not raining during the maintenance activities; similarly, snowmelt events that were removed are not treated as missing records since rainfall is assumed to be zero.

Table 1: Goose Station Daily Average Temperature 2004-2025

Year	Daily Temperature Average (°C) ^(a)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann ^(b)
2004	–	–	–	–	–	–	–	6.8	1.7	-10.1	-22.4	-30.8	–
2005	-30.6	-32.6	-26.1	-13.0	-8.7	5.1	9.6	9.8	0.6	–	–	–	–
2006	–	–	–	–	–	–	–	–	–	-5.9	-20.8	-20.4	–
2007	-26.3	-29.1	-28.8	-15.0	-5.7	4.7	14.0	7.0	-0.3	-6.1	-22.4	-27.1	-11.3
2008	-29.1	-33.0	-30.6	-17.5	-5.2	5.2	13.1	9.7	0.8	-4.9	-18.7	-27.9	-11.4
2009	-27.1	-28.2	-29.2	-14.5	-9.2	4.5	11.4	9.6	4.7	-9.4	-17.0	-24.9	-10.7
2010	-26.5	–	–	–	–	6.5	13.8	10.6	2.6	-4.4	-16.1	-23.6	–
2011	-30.0	-26.5	-24.0	-19.0	-3.5	5.3	14.5	11.4	3.7	-5.5	-18.6	-25.8	-9.7
2012	-30.8	-23.6	-26.0	-15.2	-1.3	7.7	14.2	11.0	5.7	-6.5	-19.9	-28.4	-9.3
2013	-31.7	-29.9	-25.7	-17.5	-4.5	11.4	10.8	11.4	3.2	-3.9	-22.0	-28.5	-10.5
2014	-30.2	-28.4	-26.5	-17.5	-3.2	9.2	14.6	8.5	0.6	-7.6	-20.2	-24.7	-10.3
2015	-28.5	-29.5	-24.8	–	–	–	–	–	–	–	–	–	–
2016	–	–	–	–	–	–	–	–	–	–	–	–	–
2017	–	–	–	–	-2.1	7.8	12.4	13.7	5.6	-8.5	-20.2	-24.9	–
2018	-26.3	-29.0	-24.9	-17.4	-7.0	7.5	13.1	7.9	-1.0	-8.7	-22.1	-21.2	-10.6
2019	-31.8	-28.8	-18.3	-16.8	-6.1	4.4	9.8	9.8	3.7	-4.6	-17.6	-25.7	-10.1
2020	-26.3	-30.8	-26.3	-17.1	-7.3	7.6	14.9	11.5	2.5	-6.0	-20.1	-24.9	-10.2
2021	-26.2	-30.6	-26.7	-18.0	-6.7	5.1	12.1	9.2	4.3	-0.9	–	-28.5	–
2022	-29.7	-31.8	-23.5	-18.4	-3.5	8.8	14.9	11.2	4.1	-4.9	-17.7	-28.6	-9.9
2023	-26.4	-31.8	-28.5	-14.0	2.9	10.5	15.0	10.9	5.6	-1.7	-17.0	-19.8	-7.8
2024	-29.1	-27.0	-25.6	-12.7	-0.2	7.0	14.5	12.2	5.7	-3.6	–	-22.4	–
2025	-26.3	-25.4	-24.8	-15.5	-2.8	6.7	11.0	11.9	6.6	-2.0	-13.2	-29.1	-8.5
2004-2025 Daily Temperature Average (°C) Statistics													
Min	-31.8	-33.0	-30.6	-19.0	-9.2	4.4	9.6	6.8	-1.0	-10.1	-22.4	-30.8	-11.4
Max	-26.2	-23.6	-18.3	-12.7	2.9	11.4	15.0	13.7	6.6	-0.9	-13.2	-19.8	-7.8
Avg	-28.5	-29.2	-25.9	-16.2	-4.4	6.9	13.0	10.2	3.2	-5.5	-19.2	-25.6	-10.0
Med	-28.8	-29.1	-26.0	-16.9	-4.5	6.9	13.5	10.6	3.7	-5.5	-19.9	-25.7	-10.2
N	18	17	17	16	17	18	18	19	19	19	17	19	13

“–” = no data or data does not meet the completeness requirements; “°C” = degrees Celsius; “Ann” = annual; “Avg” = average; “Med” = median; “N” = number of years.

^a Daily temperature averages are only included and used in the statistics for months that meet the 3 and 5 rule (i.e., no more than 3 consecutive missing data points and no more than 5 missing data points total).

^b Annual averages are only presented and used in the statistics if monthly daily average temperature data was complete

Table 2: Goose Station Extreme Temperatures 2004-2025

Period	Extreme Maximum Temperature (°C)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
2025	-8.2	-7.6	-15.9	-2.3	20.0	19.9	24.5	26.4	19.3	7.9	1.2	-16.3	26.4
2004-2025	-3.5	-1.5	0.2	5.8	21.4	29.8	31.5	31.3	21.4	11.9	1.3	0.4	31.5
Period	Extreme Minimum Temperature (°C)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
2025	-38.0	-39.2	-34.1	-32.9	-19.7	-3.9	2.4	0.9	-3.4	-15.7	-28.0	-39.1	-39.2
2004-2025	-45.5	-44.7	-43.8	-41.4	-29.5	-9.0	0.3	-3.4	-11.4	-30.0	-39.1	-42.5	-45.5

“°C” = degrees Celsius; “Ann” = annual.

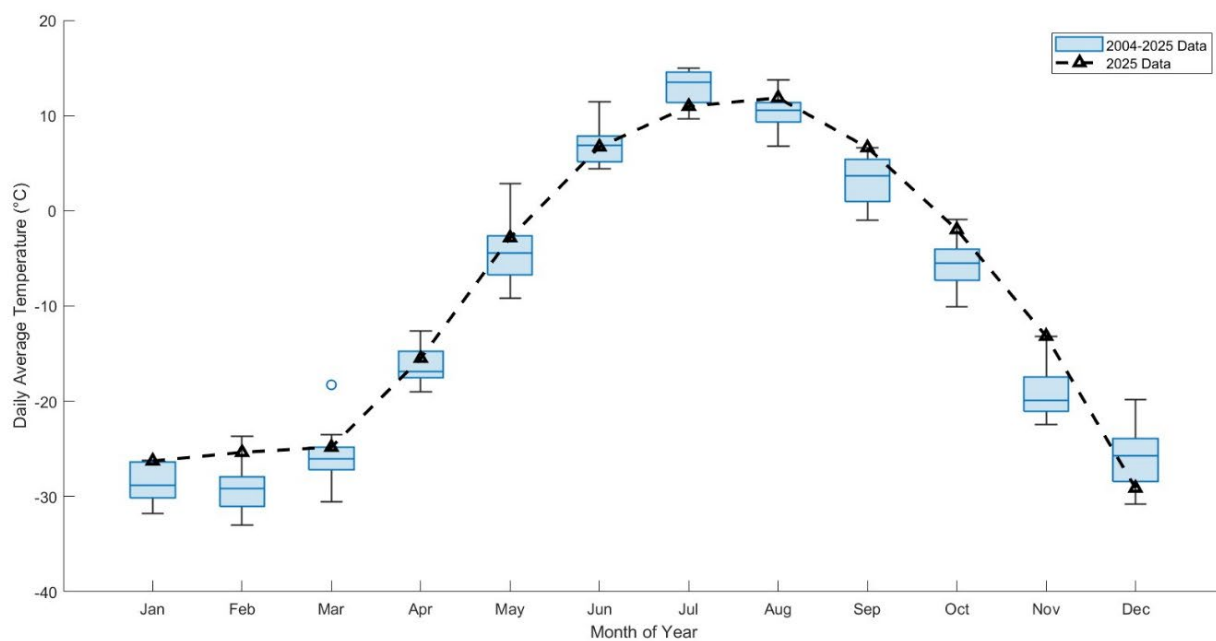


Figure 1: Goose Station Daily Average Temperature Box Plot Comparison 2004-2025

Table 3: Goose Station Total Rainfall 2004-2025

Year	Total Rainfall (mm) ^(a)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann ^(b)
2004	–	–	–	–	–	–	–	40.1	25.7	0.3	0.0	0.0	–
2005	0.0	0.0	0.0	0.0	0.0	11.4	57.7	16.0	14.0	–	–	–	–
2006	–	–	–	–	–	–	–	–	–	0.3	0.0	0.0	–
2007	0.0	0.0	0.0	0.0	0.5	0.3	0.8	0.3	2.3	11.2	0.0	0.0	15.2
2008	0.0	0.0	0.0	1.3	3.8	20.8	1.8	71.1	35.6	1.3	0.0	0.0	135.6
2009	0.0	0.0	0.0	0.5	0.5	21.3	27.2	25.1	37.1	0.8	0.0	0.0	112.5
2010	0.0	0.0	0.0	0.3	0.3	18.5	41.2	6.4	16.0	5.6	0.0	0.0	88.1
2011	0.0	0.0	0.0	0.0	0.0	13.5	21.1	53.6	65.3	11.4	0.0	0.0	164.8
2012	0.0	0.0	–	–	10.2	16.0	20.6	32.3	27.9	2.5	–	–	111.5
2013	0.0	0.0	–	0.0	6.4	25.7	39.6	36.3	40.1	6.9	0.0	0.0	154.9
2014	–	–	0.0	3.8	14.7	18.8	26.7	64.8	18.3	0.8	0.0	0.0	147.8
2015	–	–	–	–	–	–	–	–	–	–	–	–	–
2016	–	–	–	–	–	–	–	–	–	–	–	–	–
2017	–	–	–	–	7.9	10.4	53.3	34.3	25.1	0.5	0.0	0.0	131.6
2018	0.0	0.0	0.0	0.0	0.0	3.8	23.1	56.9	13.5	0.5	0.0	0.0	97.8
2019	–	–	–	–	–	–	–	–	–	–	–	–	–
2020	–	–	–	–	–	–	–	–	–	1.1	0.0	0.0	–
2021	0.0	0.0	0.0	0.0	14.4	15.2	20.9	29.3	34.0	10.3	–	0.0	124.1
2022	0.0	0.0	0.0	0.0	0.9	20.9	23.3	21.4	27.2	–	0.0	0.0	–
2023	0.0	0.0	0.0	–	11.0	66.8	4.1	71.8	44.0	18.7	0.0	0.0	216.4
2024	0.0	0.0	0.0	0.0	7.1	7.6	39.7	44.1	9.1	14.7	–	0.0	122.3
2025	0.0	0.0	0.0	0.0	20.6	70.5	25.4	41.8	22.2	14.3	2.5	0.0	197.3
2004-2025 Total Rainfall (mm) Statistics													
Min	0.0	0.0	0.0	0.0	0.0	0.3	0.8	0.3	2.3	0.3	0.0	0.0	15.2
Max	0.0	0.0	0.0	3.8	20.6	70.5	57.7	71.8	65.3	18.7	2.5	0.0	216.4
Avg	0.0	0.0	0.0	0.4	6.1	21.3	26.6	38.0	26.9	5.9	0.2	0.0	130.0
Med	0.0	0.0	0.0	0.0	5.1	17.3	24.4	36.3	25.7	2.5	0.0	0.0	127.8
N	14	14	13	13	16	16	16	17	17	17	15	17	14

¹ data that was removed due to station maintenance activities are not considered missing records as it was not raining during the maintenance activities; similarly, snowmelt events that were removed are not treated as missing records since rainfall is assumed to be zero.

“–” = no data or data does not meet the completeness requirements; “Ann” = annual; “Avg” = average; “Med” = median; “mm” = millimetre;

“N” = number of years.

^a Monthly rainfall totals are only included and used in the statistics for months where data completeness is 100%.

^b Annual rainfall totals are only included for years where May through October data completeness is 100%.

Table 4: Goose Station Daily Rainfall Maximums 2004-2025

Period	Maximum Daily Rainfall (mm)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
2025	0.0	0.0	0.0	0.0	15.9	19.2	10.8	15.5	7.6	6.8	2.5	0.0	19.2
2004-2025	0.0	0.0	0.0	3.3	15.9	20.7	26.9	24.4	22.2	18.2	2.5	0.0	26.9

"Ann" = annual; "mm" = millimetre.

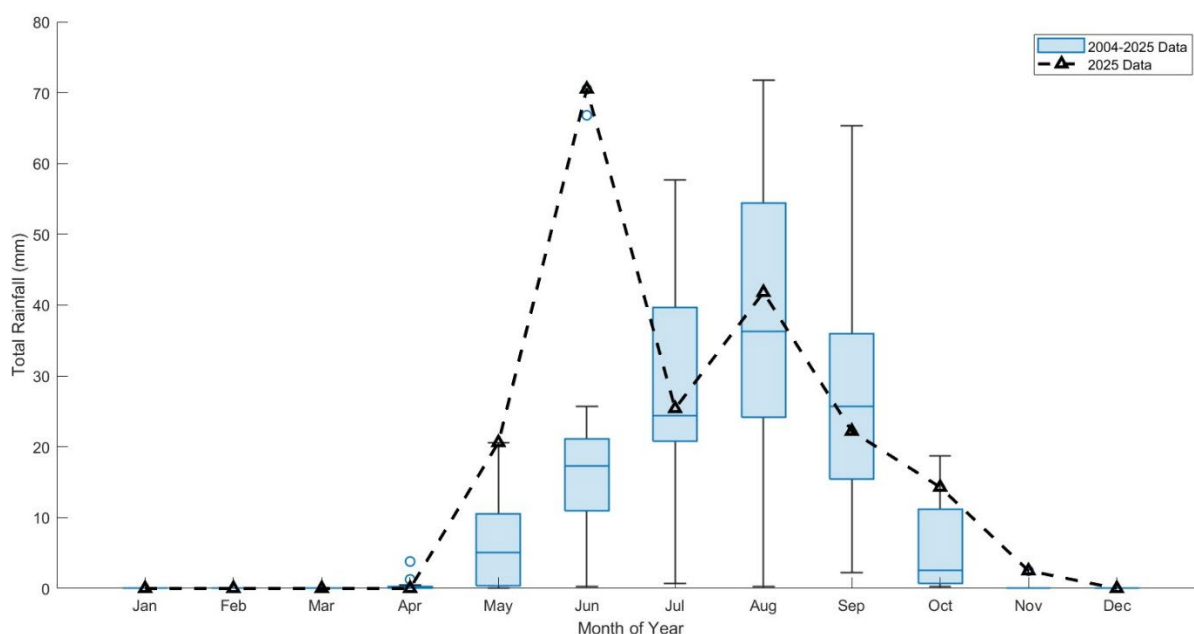


Figure 2: Goose Station Rainfall Totals Box Plot Comparison 2004-2025

Wind:

For wind comparisons, monthly mean wind speeds summarized in Table 5 were calculated from hourly records at Goose per ECCC methods and are summarized for each month from 2004 through 2025. A box plot comparison of 2004-2025 wind speed data with 2025 averages overlayed is provided in Figure 3. Extreme wind speed data is also summarized monthly in Table 6 for 2025 and the complete 2004 through 2025 dataset.

There was no new record high or record low monthly average wind speeds in 2025 at Goose Station, however, June and July average wind speeds were notably higher than normal. In regards to maximum wind speeds, both the 2025 July maximum (82.3 km/hr) and August maximum (79.5 km/hr) are the highest on record for those months at Goose Station.

Table 5: Goose Station Average Hourly Wind Speeds 2004-2025

Year	Average Hourly Wind Speed (km/hr) ^{(a)(b)}												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
2004	–	–	–	–	–	–	–	17.9	19.6	17.8	15.8	15.9	–
2005	14.6	–	–	18.1	18.6	13.7	16.7	17.1	17.3	–	–	–	–
2006	–	–	–	–	–	–	–	–	–	18.6	16.4	16.1	–
2007	14.9	17.8	12.8	12.4	16.5	15.4	13.3	22.0	15.7	18.2	18.7	15.9	16.1
2008	18.8	–	–	15.6	15.2	14.1	14.2	17.2	18.5	14.6	11.1	17.1	15.2
2009	18.2	15.5	–	18.4	15.7	13.6	15.1	16.1	17.8	15.7	17.8	21.6	16.7
2010	17.0	12.4	13.3	16.3	10.5	14.8	15.5	16.2	14.7	17.1	21.4	19.2	15.7
2011	12.9	19.3	–	14.1	15.1	17.4	14.4	15.8	17.4	17.6	17.0	17.2	16.0
2012	13.2	14.9	14.4	18.5	16.2	15.6	17.3	16.8	20.0	17.3	22.3	14.5	16.7
2013	18.5	14.6	19.5	19.0	16.7	18.5	21.0	15.4	18.7	19.2	17.2	21.4	18.3
2014	22.4	23.6	22.1	17.8	20.1	18.5	17.5	18.4	22.6	18.5	26.6	21.2	20.7
2015	24.5	23.6	20.8	–	–	–	–	–	–	–	–	–	–
2016	–	–	–	–	–	–	–	–	–	–	–	–	–
2017	–	–	–	–	15.9	19.1	22.0	17.4	18.1	16.8	18.5	16.9	–
2018	11.5	21.0	19.7	18.6	20.4	18.2	18.2	22.0	24.5	20.8	15.8	20.1	19.2
2019	17.8	18.4	21.6	18.8	17.0	21.2	20.7	20.8	19.8	23.7	18.0	17.9	19.7
2020	17.8	18.0	20.4	20.7	19.3	15.8	19.3	19.9	21.0	21.8	18.2	15.9	19.0
2021	13.5	19.6	17.8	20.4	16.5	18.8	18.9	20.2	17.2	19.0	–	14.2	18.0
2022	21.7	22.1	22.1	17.5	18.4	18.4	17.8	19.3	21.1	23.5	17.5	18.9	19.8
2023	15.4	17.0	12.6	14.5	20.6	17.9	16.2	17.5	22.4	21.5	19.7	–	17.9
2024	17.0	19.4	19.3	16.9	18.0	17.7	17.4	17.3	20.8	26.7	–	19.6	19.1
2025	19.8	21.3	16.9	17.3	17.4	20.4	21.7	17.1	20.3	22.5	18.2	19.0	19.3
2004-2025 Average Hourly Wind Speed (km/hr) Statistics													
Min	11.5	12.4	12.6	12.4	10.5	13.6	13.3	15.4	14.7	14.6	11.1	14.2	15.2
Max	24.5	23.6	22.1	20.7	20.6	21.2	22.0	22.0	24.5	26.7	26.6	21.6	20.7
Avg	17.2	18.7	18.1	17.4	17.1	17.2	17.6	18.1	19.3	19.5	18.2	17.9	18.0
Med	17.4	18.8	19.4	17.8	16.9	17.8	17.4	17.4	19.6	18.6	18.0	17.6	18.2
N	18.0	16.0	14.0	17.0	18.0	18.0	18.0	19.0	19.0	19.0	17.0	18.0	16.0

“–” = no data or data does not meet the completeness requirements; “Ann” = annual; “Avg” = average; “Med” = median; “mm” = millimetre; “N” = number of years.

^a Monthly and annual average wind speed values are only included and used in the statistics for months and years where data completeness is 90%.

^b The Goose Station anemometer height was 3-metres from when it was installed until March 2012 when it was upgraded to 10-metres.

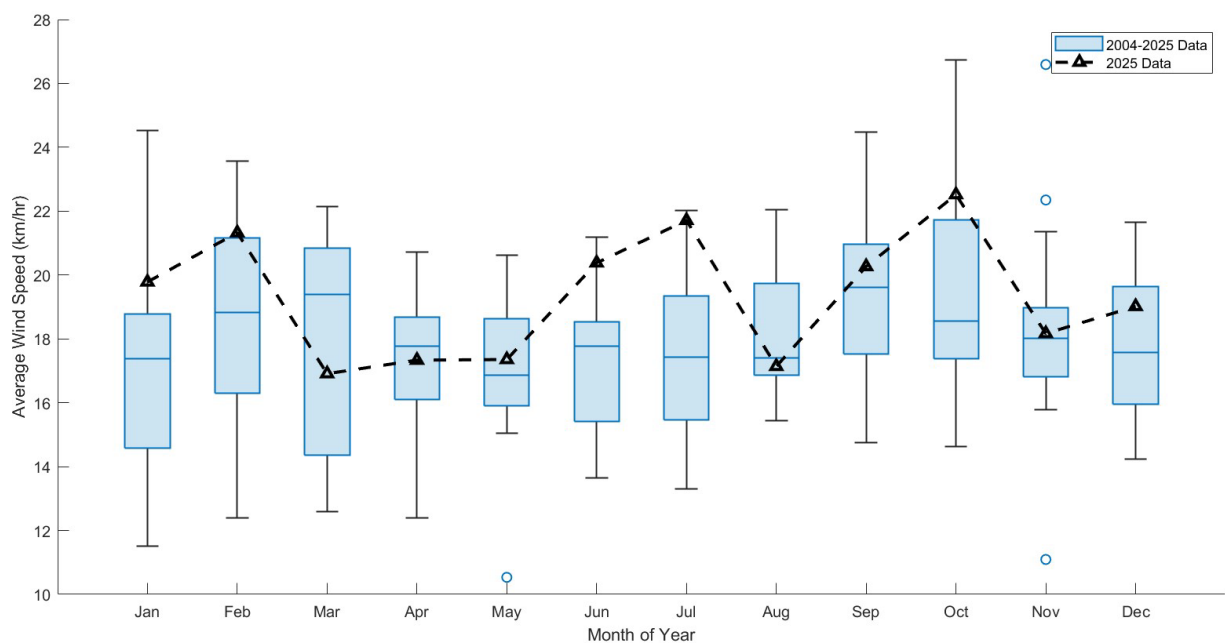


Figure 3: Goose Station Average Wind Speed Box Plot Comparison 2004-2025

Table 6: Goose Station Maximum Wind Speeds 2004-2025

Period	Maximum Wind Speed (km/hr)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
2025	74.6	70.1	61.5	75.4	69.9	67.0	82.3	79.5	70.0	83.5	73.6	74.0	83.5
2004-2025	98.1	93.8	87.9	76.9	71.4	80.4	82.3	79.5	81.4	116.1	90.4	110.6	116.1

"Ann" = annual; "km/hr" = kilometres per hour.

7.11 KIA #50 (TC11)

KIA Comment & Request/Recommendation

- B2Gold Nunavut provided an updated Site-wide Ground Thermal Monitoring – Annual Reporting (March 20, 2026) and a Site-wide Ground Thermal Monitoring Plan (March 31, 2026).
- Section 5.1 of the Monitoring Plan indicates that “Standard operating procedures (SOPs) will be developed and appended to this monitoring plan once the monitoring sites and instruments have been established. The SOP will ensure consistent and complete data collection.” It is understood that the monitoring sites have been established and therefore a SOP should soon be available for review (as indicated in B2BGold Nunavut “Next Steps”).
- In addition, B2BGold Nunavut indicates that a Microsoft PowerBI App has been developed for data analysis and visualization. The information available, however, does not provide details on this analysis, e.g. how checks are carried out and outliers are identified (what is an “abnormal reading (see Section 5.3)?”).
- Request: It is recommended that B2BGold Nunavut provide additional information on the data management and quality checks as well as the accuracy of the sensors used.
- In addition, B2BGold Nunavut should provide a copy of the SOP as soon as it is available for the KIA to review and comment.

B2Gold Response

- B2Gold acknowledges KIA’s request for additional information on data management, quality checks, and sensor accuracy, as well as the request for a Standard Operating Procedure (SOP) for ground thermal monitoring. Ground temperature cables at Back River are a mix of digital Beadedstream systems (Primary Pond Dam and MLA tank farm) and analogue thermistor strings from RST (e.g., historic/background sites and the Saline Water Pond Dam now under construction). For the purposes of the Thermal Monitoring Plan, both systems are considered sufficiently accurate to meet the monitoring objectives (detecting active layer thickness, permafrost temperature, and long-term trends), for the following reasons:
 - **Beadedstream digital cables (Primary Pond, MLA tank farm):**
 - These are calibrated digital ground-temperature cables that perform analog-to-digital conversion at the sensor and use factory calibration coefficients, so the logger reads temperature directly rather than converting resistance to temperature.
 - In practice, manufacturer specifications for modern Beadedstream digital thermistor chains are typically on the order of $\pm 0.1 - 0.2$ °C over the permafrost temperature range, assuming proper installation and logger configuration.
 - **RST analogue thermistor strings (Saline Water Pond Dam (currently under construction) and historic sites):**
 - The historic and some new background/infrastructure sites use RST thermistor cables read by Campbell Scientific or RST data loggers.

- These are conventional analogue thermistors; overall system accuracy is governed by the thermistor calibration and the logger's resistance measurement accuracy. When used with properly calibrated loggers, typical effective accuracy is also on the order of $\pm 0.1 - 0.2$ °C over the relevant temperature range.

All collecting ground-temperature data are managed in a central Power BI database, with routine QA/QC checks and flagging of "abnormal" readings (values outside the historic range or showing unexplained step changes). In addition, regular instrument inspection and maintenance (visual checks of cables, enclosures, loggers; repair or replacement as needed) are part of the implementation and maintenance framework. Given these design and QA/QC measures, the effective accuracy of the ground-temperature cables at Primary Pond, Saline Water Pond Dam, and the MLA tank farm is considered adequate relative to the magnitude of thermal signals of interest (typically several degrees Celsius between active layer and underlying permafrost). As noted in the *Back River Project: Site-wide Ground Thermal Monitoring Plan – Revision 01* (March 2026), SOPs are to be developed and appended once the monitoring sites and instruments have been established. B2Gold confirms that SRK will develop a detailed SOP for ground temperature monitoring for the commissioned structures and facilities within our scope (e.g., Primary Pond Dam, MLA fuel tank farm, and other thermally monitored dams/pads) will be developed. The SOP will cover:

- Field data-collection procedures (manual and data-logger downloads),
- Data management and QA/QC steps (including how "abnormal readings" are defined, flagged, and reviewed in the Microsoft Power BI-based database), and
- Procedures for verifying sensor performance and documenting maintenance/repairs.

Once finalized, the future SOPs will be appended to the Site-wide Ground Thermal Monitoring Plan and included in the annual submissions.

7.12 KIA #51 (TC13)

KIA Comment & Request/Recommendation

- SRK Consulting (Canada) Inc. completed the 2025 Annual Geotechnical Inspection (March 2026), stating that " ... significant issues were not expected with the current infrastructure at this time. [...] Observations of the interim state of the construction have been made in an attempt to allow for the site to improve or optimize the final configuration of the earthworks and water management infrastructure, aiming to prevent notable permafrost degradation and aiming to reduce ongoing maintenance requirements." The report cites following the top five priorities for consideration:
 1. Goose and MLA Airstrips: Monitor and evaluate long-term water management strategies to address flow impediments at the airstrips. Goose Airstrip: The design of the Rascal Diversion Berm should be updated to reflect current site conditions.
 2. Finish the updated Goose Neck culvert crossing installations before freshet or remove the road fill material in the way of downstream flow.
 3. Revisit the constructed berm layout and thicknesses at Goose – Echo Diversion.
 4. Repair the liner damage and erosion to some of the tank pedestals noted at both of these tank farm locations at the Goose and MLA tank farms.

5. A formal monitoring program should be established, and deformation surveys should be completed at the Goose MSE walls.
 6. The report further indicates that historic roadways are underbuilt, and additional fill is required to reach design thicknesses.
 7. Finally, the 2025 AGI notes multiple locations where erosion was observed and culverts that are (partially) blocked or lacking at location where surface water flow should be promoted.
- Request: It is requested that B2Gold Nunavut provide an update on how high priority observations listed in the AGI have been or will be addressed. Some observations have been carried over from the 2023 and 2024 AGIs and if the conditions remain unmitigated, long-term impacts on the terrain conditions may develop, specifically if surface drainage is impacted.

B2Gold Response

- B2Gold acknowledges KIA's comment and is providing the following responses with respect to the specific AGI priorities:
- **Items 1, 2, 3, 5, 6 and 7** (airstrips and Rascal Diversion, Goose Neck culvert crossings, Goose-Echo Diversion berm layout, Goose MSE wall monitoring, underbuilt roads, and erosion/culvert issues):
- **Item 4** – Liner damage and erosion at Goose and MLA tank farms: B2Gold can confirm that For the MLA fuel tank farm, HDPE liner repairs were completed under Ramp 1 (main tank farm exit), including removal and replacement of damaged liner and geotextile, installation of new textured 60-mil HDPE panels, QA/QC testing of welds, and issuance of a one-year installation warranty dated June 30, 2026. These repairs also included patch work on the east side of Tank 5 and near the NW corner sump (photos below). Detailed are provided in in Appendix KIA 51_TC13. For the Goose tank farm, discussion and evaluation are ongoing and updates will be provided when the work is complete.

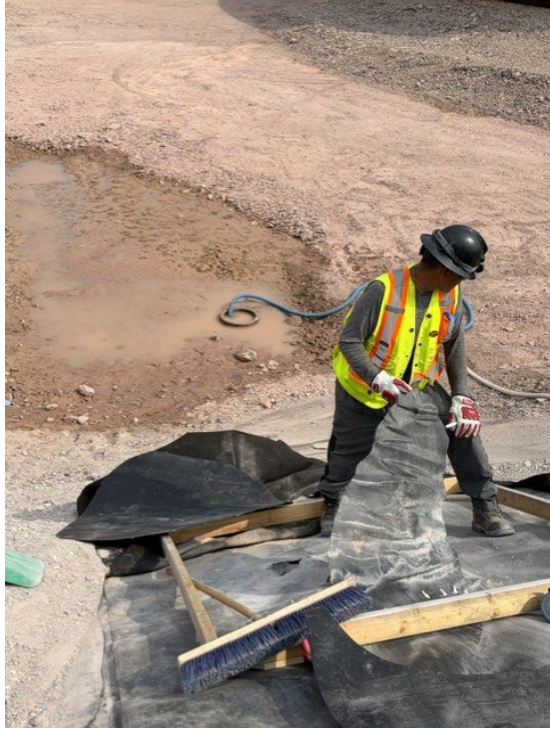


Photo 1: Damaged Liner NW Corner of Tank Farm 1



Photo 2: Exposed HDP Liner NW Corner was fixed and tested



Photo 3: Removing Damaged Liner



Photo 4 Replacing Geotextile

7.13 KIA #36 (TC17)

KIA Comment & Request/Recommendation

- Project Condition 17 states, “The Proponent shall conduct tests of the tailings and treatment sludges as they are produced to evaluate the potential for remobilization of arsenic from these materials.” Section 4.4.2, specifically Table 4.4-1, recounts the unauthorized discharge or spills that occurred in 2025. Section 4.4.2 states, “B2Gold Nunavut records submitted to the NT/NU Spill Line may differ from what has been posted to the online database,” but does not specify why such differences in reporting may occur. It is thus also unclear how the information in Table 4.4-1 was compiled. One of the unauthorized discharges in Table 4.4-1 is a discharge of 7,000 L of tailings slurry at the Process Plant on 01-Nov-2025. Column “Mitigation” describes clean-up for this discharge of tailings slurry as follows: “The clean-up effort included scraping up slurry off the ground and dumping it into the temporary berm erected on the east side of the Mill. Also used a pump to pump as much slurry as possible ~1000L back into containment. On December 6 the remaining frozen ice and contaminated soil was excavated and stored in mega-bags within lined area for future treatment in the spring or to be backhauled off site to be properly disposed of. ” There is no mention of if these spilled tailings slurry was collected for testing. Other than testing the spilled tailings materials, significant questions remain regarding how this spill was cleaned up. Specifically:
 - Was the “temporary berm” mentioned in the Table 4.4-1 built to contain this spill, or for another purpose?
 - When some slurry was pumped “back into containment,” was it pumped into “temporary” containment or another area?
 - Was tailings containment in any way compromised?
 - What corrections are in place as a result of this incident?
 - Is the scraped-up or recovered slurry still in the temporary berm?
- Request: The KIA requests the following:
 - Provide an explanation why the information supplied to the NT/NU spill line would differ from what has been posted to the online database.
 - Provide a description of the source(s) of information for Table 4.4-1.
 - Provide more detail regarding the clean-up of the unauthorized discharge of tailings slurry, including but not limited to if a sample was collected for testing, if the temporary berm was constructed to contain this particular spill, and if the recovered slurry remains in the temporary containment.

B2Gold Response

- The unauthorized discharge occurred due to the power outage. The pump lost power and shut down. The control room operator at the time did not realize the pump had not been turned back on, resulting in this spill. To prevent this from happening, corrective action was implemented. Alarms were installed to notify the control room operator when pumps are not running as they should be. The tailings are tested and results will be provided in the Annual Report. A sample test results is included in Appendix CIRNAC 9_TC17. Information in Table 4.4-1 is from B2GN (sitedocs). These unauthorized discharges are recorded in Sitedocs. The tailings were removed from the surface and excavated approximately 5cm

into the rock beneath. A total of 7 loads (~105 m³) of the excavated tailings were hauled and disposed of at the bottom of the Echo TSF.

7.14 KIA #42 (TC20)

KIA Comment & Request/Recommendation

- The report indicates that thermal monitoring, geotechnical characterization, and hydrologic monitoring programs are in place, reflecting a comprehensive monitoring framework. However, these datasets are largely presented independently. Given the role of permafrost in influencing groundwater flow and seepage, a more integrated interpretation linking thermal conditions to hydrogeologic behaviour would improve clarity. A concise synthesis would help confirm whether observed conditions align with expectations.
- Request: Include a brief conceptual summary describing how thermal conditions influence groundwater flow and seepage pathways.

B2Gold Response

- B2Gold agrees that integrating thermal and hydrogeologic information in future reporting will improve clarity on how permafrost conditions influence groundwater flow and seepage behaviour. At the Back River Project, the site is underlain by continuous permafrost with ground temperatures typically between about -4.7°C and -7.5°C and an active layer of approximately 1-4 m below ground surface; permafrost thickness is on the order of several hundred meters, with localized unfrozen taliks beneath lakes and in deeper rock masses. Within this setting:

Shallow groundwater and seepage are primarily present during the thaw season, typically from late May to mid-October, when the active layer is unfrozen. Outside this period, near-surface soils and shallow groundwater are frozen and hydraulic conductivity is effectively very low; active groundwater movement is largely restricted to deeper taliks and mine workings.

Permafrost acts as a low-permeability barrier that confines groundwater flow to:

- the seasonally thawed active layer;
- unfrozen taliks beneath lakes and depressions; and
- disturbed zones around open pits, underground workings, and foundation excavations.

Changes in ground temperature and permafrost state (e.g., thawing of ice-rich soils) can alter seepage pathways by:

- increasing hydraulic connectivity in thawed zones
- changing the depth and lateral continuity of the active layer; and
- potentially increasing inflows to pits, underground workings, and contact-water ponds.

To address Term and Condition 20, the Site-wide Ground Thermal Monitoring Plan establishes long-term ground-temperature monitoring at background locations and at existing critical infrastructure such as Primary Pond Dam, the Goose Camp pad, Saline water pond Dam (under construction as of summer 2026), and the MLA fuel tank farm. Ground-temperature cables (thermistors) are installed

in dam foundations, key trenches, embankments, and pads to track permafrost and active-layer conditions beneath these facilities.

In parallel, groundwater and seepage behaviour are being or will be monitored at facilities with significant zones of influence, including:

- open pits and underground mines (e.g., Umwelt, Llama, Goose Main, Echo);
- at the toe of the overburden stockpiles and waste rock storage areas;
- contact-water and saline-water ponds; and
- other major pads and foundations identified in the Water Management Plan [240528_2AMBRP1831 *WaterManagementPlan Version 5.pdf*].

For these facilities, it is recommended that:

- Hydrogeologic instrumentation (e.g., standpipes, vibrating-wire piezometers, and/or observation wells) be installed in conjunction with ground-temperature cables in key sections;
- Annual data collection be organized during the thaw season (late May to mid-October), when groundwater levels and seepage are most representative of active flow conditions; and
- Future Annual Reports and Site-wide Ground Thermal Monitoring reports include a concise, integrated conceptual summary for each critical facility, describing:
 - how the measured ground-temperature regime (permafrost/active layer/talik) constrains groundwater flow paths; and
 - how observed groundwater levels and seepage patterns relate to those thermal conditions.

B2Gold will work with its consultants to incorporate this integrated interpretation in future submissions by explicitly linking the thermal monitoring results (Appendix F and the Site-wide Ground Thermal Monitoring Plan) to available hydrogeologic monitoring data for Umwelt Pit, and other critical facilities identified under Term and Condition 20.

7.15 KIA #35 (TC21)

KIA Comment & Request/Recommendation

- Is it stated, “the reported detection limit in 2025 for total chromium (0.05-0.10 mg/L) exceeded the guideline for hexavalent chromium (Cr(VI); 0.0015 mg/L; CCME 2025) in all samples and exceeded the guideline for trivalent chromium (Cr(III); 0.056; CCME 2025) in one sample, so guideline comparisons for chromium were inconclusive.” The statement is inconsistent, asserting both exceedances and inconclusive comparisons. Where detection limits exceed guideline values, the correct conclusion is that compliance cannot be determined until proven otherwise. Given the significant toxicity of hexavalent chromium (Cr(VI)), it would be prudent to undertake additional water sampling to verify compliance with CCME guidelines. This work should be conducted by an accredited laboratory capable of achieving detection limits below the CCME MAL guidelines and consistent with the target detection limits specified in the MMP. Completing this additional sampling in advance of the next scheduled monitoring would reduce uncertainty and provide a more reliable basis for assessing compliance.

- Request: The KIA requests the following:
 - Please conduct additional water sampling using an accredited laboratory capable of achieving detection limits below the CCME MAL guidelines and consistent with the target detection limits specified in the MMP

B2Gold Response

- B2Gold acknowledges KIA's recommendations and will followup with the accredited laboratory to ensure detection limits do not exceed guideline values to allow meaningful data analysis and interpretation.

7.16 KIA #37 (TC21)

KIA Comment & Request/Recommendation

- The 2024 AEMP reported increasing concentration for several parameter concentrations in the West Bay area of Goose Lake since September 2023. In an attempt to identify the cause of the increased concentrations an investigative sampling program was undertaken. The investigation centered on nitrate, nitrite and cobalt since Low Action Level was exceeded for these Parameters of Interest (POIs). Targeted sampling locations were selected.
 - Several factors were identified as potential causes including:
 - Seepage and runoff from the site
 - Water seeping through the road
 - Contact water could be entering the environment
 - Contaminated soils that were not removed.

The report concludes by stating that without assessing both concentration and flow rate, it is difficult to accurately determine the relative contributions of each stream to changes in the lake. The report does not contemplate any mitigation measures or adaptive management plan to be implemented in order to address the increased concentrations.

- Recommendations: The investigative sampling program provided valuable results, but no follow-up was provided in the write-up. If the nitrate and cobalt concentrations have been increasing over three years, rather than continuous monitoring, mitigation measures should be implemented, rather than spending additional time and resources on determining flow rate. Or conduct that flow rate and analysis and implement mitigation measures on the basis of the results.

B2Gold Response

- B2Gold acknowledges KIA's recommendations and is implementing some mitigations measures (e.g., erosion and sediment control) while continuing the investigative sampling to improve the understanding of the sources potentially contributing to the increasing trends observed. Additional mitigations measures such as surface water management structures (e.g., sumps, retention ponds, berms, etc.) informed by site-specific conditions are being designed and will be implemented in the next few years.

7.17 KIA #38 (TC21)

KIA Comment & Request/Recommendation

- The AEMP results are presented in a clear and structured manner, and the conclusion that current concentrations do not pose a risk to aquatic life appears reasonable. However, interpretation is focused primarily on current conditions rather than how these results may evolve over time. While changes relative to baseline are acknowledged and we understand that mitigative measures are planned, there is limited discussion of whether these trends are stabilizing, increasing, or likely to change under continued operations. As additional years of data become available, a more explicit discussion of trends would improve overall interpretability.
- Recommendation: Include brief commentary on the trends observed over time and any expectations for how conditions may evolve under current management practices.

B2Gold Response

- B2Gold acknowledges KIA's recommendations and is implementing some mitigations measures (e.g., erosion and sediment control) while conducting additional investigative testing (e.g., sediment, fish tissue) to improve the understanding of the increasing trends observed. Additional mitigations measures such as surface water management structures (e.g., sumps, retention ponds, berms, etc.) informed by site-specific conditions are being designed and will be implemented in the next few years. These combined mitigations measures will help evaluate performance (i.e. how conditions may evolve over time).

7.18 KIA #44 (TC21)

KIA Comment & Request/Recommendation

- Recommendations for the water quality are to continue AEMP sampling per the AEMP study design, with the addition of West Bay over the next three years, to initiate water quality sampling of Propeller Lake in 2026, and to adopt the newly developed chlorophyll a benchmark.
- Request: It is concerning that water quality (37 parameters) has changed considerably from baseline and that there are exceedances of the Low Action Levels for Aquatic Life. Sources and explanations of increased concentrations of all 37 parameters would be needed especially for those parameters with no benchmarks (i.e., Calcium, Magnesium, Potassium, Sodium, Reactive Silica, Total Nitrogen), including whether these increased concentrations would be harmful to aquatic life, fish and fish habitat.
In addition, it is important to monitor and determine that mitigation measures to improve water management in relation to aquatic life and fish and fish habitat are working.

B2Gold Response

- B2Gold acknowledges KIA's recommendations and is implementing some mitigations measures (e.g., erosion and sediment control) while conducting additional investigative testing (e.g., sediment, fish tissue) to improve the understanding of the increasing trends

observed and their potential effects on aquatic life, fish and fish habitat. Additional mitigations measures such as surface water management structures (e.g., sumps, retention ponds, berms, etc.) informed by site-specific conditions are being designed and will be implemented in the next few years. These combined mitigations measures will help evaluate performance (i.e. how conditions may evolve over time).

7.19 KIA #39 (TC22)

KIA Comment & Request/Recommendation

- The report presents a clear description of observed increases in trace metals, nitrate, nitrite, and cobalt in Goose Lake relative to baseline conditions. The explanation linking these changes to contact water inputs, runoff, and seepage from disturbed areas is logical and consistent with expected site processes. That said, the interpretation remains primarily qualitative. At present, it is difficult to clearly differentiate the relative contribution of individual source areas or pathways, including runoff, seepage, and direct inputs. This distinction will become increasingly important as monitoring continues and longer-term trends begin to emerge.
- Request: As part of the planned mitigation measures and additional engineering controls planned for the project, provide an assessment and discussion on relative source contributions based on catchments. It was not clear exactly what the source areas were of the uncontrolled freshet runoff water and the relative contribution from each area.

B2Gold Response

- The lack of engineered water management structures has limited the site ability to effectively manage contact water, which is believed to be one of the potential causes of the observed water quality changes noted in Goose Lake. The short duration and variability of freshet runoff events make it difficult to collect enough data to evaluate the relative contribution from each area or source. However, despite the fact that monitoring of runoff water is no longer required during the Operational Phase (B2Gold Water License requirements) B2Gold is committed to protect Goose Lake water quality, therefore the company is continuing to monitor runoff water when flowing (during and after freshet) to improve the understanding of the sources potentially contributing to the increasing trends observed. Results will be provided when ready in future annual reports.

7.20 KIA #40 (TC22)

KIA Comment & Request/Recommendation

- The report identifies uncontrolled contact water entering Goose Lake during freshet as a contributing factor to observed water quality changes. This linkage is clearly described and consistent with the reported monitoring results. However, the report indicates that long-term contact water management infrastructure is still under development. While interim mitigation measures appear to be in place, the absence of a fully established system introduces some uncertainty regarding performance during peak flow conditions. As the project transitions into operations, continued reliance on interim or responsive controls may limit confidence in the long-term effectiveness of contact water management.

- Request: Provide a high-level description of the planned long-term contact water management approach, including how peak freshet conditions will be managed. We understand that a 3rd party engineering firm is being retained to help develop and construct legitimate and long-term contact water management structures. We look forward to reviewing these plans later.

B2Gold Response

- B2Gold notes that site water management at the Goose Mine, including the Marine Laydown Area, is guided by an approved Water Management Plan and has established site water management structures, including sedimentation ponds, to manage site water and mitigate project-related impacts to the external receiving environment, including Goose Lake. The lack of engineered water management structures has limited the site ability to effectively manage contact water, which is believed to be one of the potential causes of the observed water quality changes noted in Goose Lake. We continue to advance measures to improve sitewide water management, including sediment loads to Goose Lake, through the following:
 - Surveys to identify water quality/erosion risks associated with disturbed areas on site to inform additional site-specific erosion control/surface water management requirements;
 - Review of the performance of the existing Ore Stockpile Pond to inform redesign/optimization to improve management of surface water from the Run of Mine (ROM) ore stockpile area;
 - Improvements to maintenance practices for existing erosion control structures such as silt fencing; and
 - Exploring the establishment of additional surface water management structures such as sumps, retention ponds, berms etc., informed by site-specific conditions.

To improve freshet readiness programs from 2027 onward, we are exploring optimizations to contract the construction schedule for some of the noted surface water management structures, including sedimentation pond(s). In summary, we aim to complete the noted activities, including the establishment of additional site surface water management structures to improve site coverage over the next two years.

7.21 KIA #41 (TC22)

KIA Comment & Request/Recommendation

- The report documents several spill events in 2025, including releases of diesel, slurry, and other materials. Response actions appear to have been implemented appropriately, and reporting requirements were met. However, the number and range of reported spills suggest that these events remain a recurring operational consideration. While each event appears to have been managed effectively, the cumulative frequency may indicate opportunities to further reduce occurrence through improved controls or operational practices. This appears to be more a matter of ongoing optimization rather than a deficiency in response.
- Request: Continue to provide a summary of spill occurrences and provide a summary in the 2026 reporting of mitigation/ management measures implemented to reduce future events.

B2Gold Response

- B2Gold Nunavut acknowledges KIA's comment and understands that there are no responses required at this time. We will continue providing a summary of spill occurrences including management measures put forward to reduce future events.

7.22 KIA #43 (TC22)

KIA Comment & Request/Recommendation

- The report identifies freshet as a key driver of contact water inputs and associated water quality changes, which is consistent with the overall interpretation. However, monitoring appears to be based primarily on scheduled sampling programs. Given the short duration and variability of peak flow events, it is not clear whether peak loading conditions are fully captured. As a result, confidence in understanding peak conditions may be somewhat limited.
- Request: Where feasible, incorporate targeted monitoring events during freshet or high-flow events to better capture peak conditions.

B2Gold Response

- B2Gold Nunavut agrees with the short duration and variability of peak flow events and has committed to continuing the monitoring during freshet and/or high flow events. In addition, B2Gold is continuing to monitor the runoff during the Operations Phase, although not required by its Water License requirement. Samples will be analyzed for a comprehensive suite of geochemical parameters to improve our understanding of the water quality.

7.23 KIA #45 (TC27)

KIA Comment & Request/Recommendation

- All water intakes (e.g., in Big Lake, Goose Lake) will be screened to avoid entrainment of fish in accordance with the DFO Fresh Water Intake End of Pipe Screening Guideline (DFO 1995).
- Request: There is a newer DFO guideline for Fresh Water Intake End of Pipe Screening Guideline.
 - Please update the reference, check and make sure plan adopts the newly available guideline (DFO 2026).
 - Please clarify whether there is any monitoring and/or reporting requirement regarding water intakes. It would be helpful to see monitoring results showing that water intake and screens are working as intended.
 - DFO 2026. <https://www.dfo-mpo.gc.ca/pnw-ppe/standards-normes/fish-screen-grillage-poisson-eng.html>.

B2Gold Response

- B2Gold Nunavut can confirm that the intake screens for under-ice withdrawals are compliant with the Fisheries Act. B2Gold Nunavut routinely engages DFO once or twice each year to discuss a variety of topics related to Mine-specific approvals, including monitoring, mitigation, offsetting, and best practices to protect fish and fish health. Formal reporting of the effectiveness of fish screens is not required for the Goose Mine or winter ice road; whereas reporting of under-ice water withdrawals (e.g., volumes) is provided as part of annual reporting for the Mine water licence (see Appendix C of the annual report).

7.24 KIA #46 (TC27)

KIA Comment & Request

- Field observations found no evidence of disconnection or stranding risk.
- Request: Please provide quantitative measures and/or additional information to support statement mentioned.

B2Gold Response

- As reported in the Goose Project 2025 Annual Report Water Licence 2AM-BRP1831, total water use from Goose Lake in 2025 was 365,614 m³, which was well below the Licence allotment of 992,450 m³. Furthermore, potential risks of harm to fish and fish habitat were deemed very low through 2025. The monitoring program conducted in 2025 confirmed that there were negligible impacts of water withdrawals on fish and fish habitat. Conclusions were based on systematic downstream monitoring surveys between May 29 to 31 and July 15 to 16, 2025 in accordance with the monitoring requirements outlined in Section 4.7 of the Back River Project Fish Offsetting Plan. Furthermore, the following quantitative measurements (data) were summarized to support the conclusions around connectivity and habitat suitability: habitat, discharge, and egg and fry abundance and distribution. Weekly observational surveys by B2Gold Nunavut also confirmed that suitable conditions for fish passage were maintained through the open water season. Any observations that would have suggested otherwise would have triggered detailed follow-up investigations of the potential for stranding or barriers.

7.25 KIA #47 (TC27)

KIA Comment & Request/Recommendation

- Explanation is provided; however, it is not clear how HSI score was decreased considerably for PLI whereas HSI increased for GLO. Change of consultants and methodology used may be one reason. It is important to show that that is the only change, not the overall rearing conditions for YOY. If so, this should be clearly communicated.
- Request: Provide further fish and fish habitat monitoring detail. Please provide detailed explanation and/or breakdowns of discrepancies between GLO and PLI. HSI was updated from 0.67 to 0.4 for PLI whereas HSI was updated from 0.38 to 0.4 for GLO.

B2Gold Response

- The Subject Matter Expert (SME) for the downstream monitoring program, who was the technical lead for both programs (in 2021 and 2025), provided the background for the scoring in Section 3.5.2 of the monitoring report with additional explanation provided in

Section 4.6.2. The additional information provided in this reply should adequately address the discrepancies in the model output between study years. In the WSP study, reach-scale hydraulic conditions were derived from modelled average velocity and depth outputs under different flow scenarios, whereas in the 2025 study, observed field measurements were used in place of modelled outputs. Consistent with both studies, substrate type, fish cover type, and geomorphic habitat type were assigned at the reach scale based on dominant conditions observed during habitat mapping surveys during the respective survey year (2021 and 2025). As summarized in Section 4.6.2 of the monitoring report, the dominant geomorphic habitat type was the key factor reducing the composite HSI value at PLI because the HSI scoring system assigns 'run habitat' units to a lower suitability value than riffle or off-channel rearing habitats. The change in the classification of the habitat unit (from riffle habitat in 2021 to 'run habitat' in 2025) reflects the higher flow (discharge) conditions observed in 2025 versus 2021, not a measurement error or observational bias.

7.26 KIA #26 (TC32)

KIA Comment & Request/Recommendation

- In the current form, the habitat loss calculations shown in table 2.1-1 are based on the area of lost habitat in ha. It makes it hard to interpret these numbers without knowing the overall area of suitable habitats in different seasons.
- Request: The KIA requests the following:
 - Please provide the percentage of habitat loss in the table.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer's comments regarding the habitat loss calculations presented in the WMMP Report and provides the following clarification. The objective of footprint size monitoring and habitat loss calculations is to verify the project footprint against the predictions presented in the FEIS. As described in Section 7.3.2.1 of the WMMP Plan (B2Gold Nunavut 2024), this monitoring program tracks the as-built extent of all project components, including the Goose Mine, Marine Laydown Area (MLA), and Energy Centre, and compares these areas to the footprint assessed in the FEIS. Any exceedance of the planned Project Development Area (PDA) footprint would be identified and reported in the annual WMMP Report. Table 2.1-1 presents the habitat loss within the PDA that was assessed and approved through the FEIS and subsequent permitting processes.

The habitat loss values presented in Table 2.1-3 are expressed as a proportion of the total habitat loss predicted within the PDA. Specifically, Table 2.1-3 summarizes the amount of habitat loss that had occurred as of 2025 for each wildlife-valued ecosystem component (VEC). These values are presented relative to the habitat loss predicted in the FEIS and summarized in Table 2.1-1. As of 2025, the realized habitat loss within the Goose Mine and MLA PDAs combined is approximately 405 ha, representing 6.7% of the total habitat loss footprint of 6,080 ha assessed in the FEIS. In other words, while up to 6,080 ha of habitat loss was assessed and permitted within the PDAs, only 405 ha has been disturbed to date. For additional context regarding the habitat loss assessment methodology and predicted

effects for individual wildlife VECs, the reviewer is referred to the 2015 FEIS, which provides the detailed assessment framework and supporting analyses.

7.27 KIA #27 (TC32)

KIA Comment & Request/Recommendation

- In the report, it is stated that “habitat loss was predicted to be a non-significant residual effect, and the magnitude was classified as low for all wildlife VECs.” However, in Table 2.1-3, the calculated habitat loss for caribou is 7.4–9.2%, which seem relatively high. What were the predicted percentages of habitat loss considered moderate in the EIS.
- Request: The KIA requests the following:
 - Please clarify the criteria used to determine that these habitat loss values are not significant and are of low magnitude.

B2Gold Response

- It should be clarified that the FEIS evaluated the loss of habitat compared to the amount of habitat available in the Regional Study Area (RSA) and herd range to arrive at the conclusion that “habitat loss was predicted to be a non-significant residual effect, and the magnitude was classified as low for all wildlife VECs”. Additional details regarding the assessment methodology, assumptions, and effects determinations can be found in the 2015 FEIS. The WMMP is not re-evaluating the potential effects of the project on caribou habitat, but instead reporting the actual footprint cleared and used by the project, against the size of the Project Development Area (PDA) evaluated for the FEIS. The objective of footprint size monitoring and habitat loss reporting in the WMMP is to track the amount of habitat disturbance that has occurred relative to the habitat loss assessed and approved through the FEIS. Current habitat loss estimates for caribou represent approximately 7.4% to 9.2% of the total habitat loss permitted within the PDAs. For example, the FEIS predicted that up to 5,389 ha of caribou summer habitat would be lost within the approved PDAs. As of 2025, approximately 396 ha of caribou summer habitat has been disturbed, representing 7.4% of the habitat loss assessed and authorized within the FEIS and Project Certificate.

7.28 KIA #10 (TC34)

KIA Comment & Request/Recommendation

- Vegetation monitoring plots along the WIR are routinely replaced if the alignment of the road changes (Page 4-120). Since these plots are meant to track trends over time, it is important to know which and how many plots are original and which and how many replacements are. If there are no remaining original plots, it is unclear how detection of changes over time will occur.
- Request: The KIA requests the following:
 - Provide a summary of the number of vegetation monitoring plots that are replaced each year.
 - In the vegetation report, provide a map and provide details regarding which plots are original and which plots change for each year.

- If there are no remaining original plots, or it is likely that there will eventually be no remaining original plots, provide details on how evaluation of long-term change will be achieved.

B2Gold Response

- As the alignment of the WIR has shifted slightly through the years, photos of the WIR vegetation locations have also shifted in response to those movements. Photos were taken as close as possible to previous locations to maintain continuity through the program (Table 34-1, and Appendix K). Data collection methods and documentation have not always been consistent in previous years as both consultants and B2Gold Nunavut team have collected the data. B2Gold Nunavut is standardizing data collection starting in 2026.

7.29 KIA #48 (TC37)

KIA Comment & Request/Recommendation

- Several recommendations were made to undertake or “consider” actions in the 2024 AGI that were carried over into the 2025 AGI. Several recommendations were identified in Table 3: Summary of 2025 AGI Observations and Recommendations for the Goose Property. Several of these recommendations had also been identified in the 2024 AGI and were carried over. Recommendations included considering undertaking mitigative action. However, considering an action will not mitigate an effect that is already occurring. For example, long-term water conveyance through portions of the airstrip should be implemented since soft shoulder conditions may lead to substantial erosion resulting in compromising fish habitat and fish passage.
- Request: Explanation should be provided regarding reasons why the recommendations were not acted upon. Also, information should be provided regarding the nature of the “considerations” and if these will translate into mitigative actions and if not, provide rationale.

B2Gold Response

- B2Gold is committed to protecting fish habitat and fish passage and is therefore taking actions to address some of the AGI recommendations. For example, the long-term water conveyance through portions of the airstrip (Rascal Stream East diversion) is underway. Design is almost complete and will be submitted to the NWB and DFO in August for approval as per the requirements before construction can begin. Updates will be provided in due course.

7.30 KIA #20 (TC40)

KIA Comment & Request/Recommendation

- Caribou seasonal starting and ending dates are herd-specific and are shifting due to climate change. There are modelling techniques that use collar data and movement information to determine the start and end of spring migration and calving seasons for each collared individual. Individual-based analysis avoids lumping together animals involved in multiple life history events (e.g., with the inflexible season defined as “spring migration” by Nagy (2011), some individuals may be migrating while others remain overwintering). Grouping together animals in different seasonal behaviours can result in utilization of distributions

(UDs) that are much larger than reality or could geographically shift the seasonal ranges represented by UD to inaccurate areas for a given season.

- Request: The KIA requests the following:
 - Please use modern analyses to test whether Nagy (2011) dates are accurate for each herd interacting with the project area and if date ranges may include animals in two different life history phases.

B2Gold Response

- B2Gold Nunavut is aware that climate change has caused caribou to alter their movement patterns compared to the seasonal dates presented in Nagy (2011). The beginning of the calving season for the Beverly herd has drifted later in the year, leading to many animals still migrating north during the calving dates presented in Nagy (2011). B2Gold Nunavut has been accommodating this change by separating collar locations of animals still migrating towards the calving range, and those who have reached the calving range and slowed down to calve.
- B2Gold Nunavut recognizes the importance of ensuring that seasonal classifications are based on the best available information and recommends that this topic be discussed at the upcoming CTAG meeting in September in advance of the 2026 annual reporting cycle. Such a discussion would provide an opportunity to consider emerging approaches and datasets, including the analytical tools currently being developed by the Kitikmeot Inuit Association

7.31 KIA #31 (TC42)

KIA Comment & Request/Recommendation

- In the report, it is stated that “For the calving range UD, movement rates were assessed to infer whether each collared female caribou was travelling at a rate below 6 km per day during the anticipated calving dates for each herd, with cows that were travelling at a higher rate during the calving period excluded from the calving range polygon.” It is unclear how the 6km/day was indicated as movement threshold for separating calving individuals vs. others.
- Request: The KIA requests the following:
 - Please clarify how the 6 km/day threshold was chosen. If this threshold is based on Nagy (2011), the reported daily means for the Bathurst and Beverly herds were 6.67 and 7.18 km/day, respectively. However, the standard deviations were also quite large: 6.4 and 6.99, respectively. If there is another rationale behind selecting this threshold, please explain it clearly and in detail.

B2Gold Response

- B2Gold Nunavut acknowledges the comments regarding the selection of movement thresholds used to identify the transition between spring migration and calving. The threshold of 6 km/day was selected based on commonly accepted approaches for barren-ground caribou and is supported by both the available literature (Nagy 2011) and discussions with wildlife biologists from the Government of Nunavut and the Government of the Northwest Territories.

- Given the importance of distinguishing spring migration from calving in a manner that is both effective and precautionary, particularly in the context of the concerns raised in KIA-NIRB-20, B2Gold Nunavut considers the use of a threshold at the lower end of the range reported by Nagy (2011) to be a conservative approach for identifying the transition from spring migration to calving for female caribou in these herds. B2Gold Nunavut also remains open to overall discussion of the demarcation of seasonal dates through the CTAG (as per the response to KIA-NIRB-20).

7.32 KIA #28 (TC45)

KIA Comment & Request/Recommendation

- In the report, it is stated that “Habitat suitability models were developed for the FEIS using a combination of ecosystem mapping and field surveys for model validation. Models consider species life history and seasonal patterns.” This high-level information makes it difficult to understand the method used to map habitat suitability.
- Request: The KIA requests the following:
 - Please clarify the method used for mapping seasonal habitat suitability
 - If the habitat suitability maps are only based on ecosystems, then please clarify why collar data were not used for this purpose.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer’s comments regarding the habitat suitability mapping methodology. The details of habitat mapping are discussed in Section 5.1 of the FEIS. The WMMP reports the total area of the project footprint as well as the area of habitat lost for each species, as mapped in the FEIS. Detailed information regarding the habitat suitability modelling methods is provided in Section 5.1 of the FEIS. B2Gold Nunavut will continue to apply these methods in WMMP reporting to ensure consistency with the assessment framework established during the regulatory review process.

7.33 KIA #29 (TC45)

KIA Comment & Request

- In the report, it is stated that “Caribou groups were typically observed heading east, as expected during spring migration of the Beverly/Ahiak herd. Direct observations of caribou as well as caribou tracks were recorded crossing the WIR nine times, suggesting effective mitigation to allow caribou to cross the WIR.” However:
 1. It is unclear how these individuals were identified as belonging to the Beverly/Ahiak herd. Individuals from other herds may also temporarily move in different directions.
 2. It is unclear what criteria were used to identify 9 crossings out of hundreds of observed caribou as significant, and as an indicator that the mitigation measures are effective.
- Request: Assess the significance of caribou crossings at the WIR.

B2Gold Response

- B2Gold Nunavut is aware that the annual WMMP Report does not include determinations of significance, but believes that observations of caribou crossing the WIR, or evidence of crossings such as tracks, provide an indication that the mitigation measures implemented along the road (e.g., reduced speed limits, convoy travel, maintenance of low snowbanks, and other mitigation measures) are supporting caribou movement across the WIR. Based on baseline studies, government survey data, collar data, and the known distribution of regional caribou herds, most caribou occurring in the vicinity of the Goose Project are understood to be associated with the Beverly/Ahiak herd. During spring migration, when caribou are moving toward their calving grounds, it is therefore expected that most individuals crossing the WIR originate from the Beverly/Ahiak herd and are travelling toward calving areas located northeast of the Goose Mine. Collar data provided to B2Gold Nunavut by the Government of the Northwest Territories three times per week further indicate that caribou crossing the WIR are predominantly identified as Beverly/Ahiak animals or are classified as unassigned. However, as discussed with KIA and the Government of Nunavut during 2024 CTAG meetings, it is also possible that a small number of Bathurst caribou may cross the WIR during spring migration before continuing toward calving areas northwest of the Goose Mine.

7.34 KIA #30 (TC45)

KIA Comment & Request/Recommendation

- In the report, it is stated that “these collar data are analyzed using kernel density analyses.” However, one of the main assumptions of traditional Kernel Density Estimation (KDE) is that the input locations are independent. Collar data are typically highly spatially and temporally autocorrelated because successive GPS fixes from the same animal are not independent observations. This violates an important assumption of KDE. As a result, using KDE without accounting for autocorrelation may underestimate seasonal ranges. This is because the method may treat closely spaced, autocorrelated locations as more independent and informative than they are, which can lead to overly narrow or biased home-range estimates.
- Request: The KIA requests the following:
 - Please use methods that can account for spatial and temporal autocorrelation in collar data. Autocorrelated Kernel Density Estimation (AKDE) is one such method.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer’s comments regarding the treatment of autocorrelation in the kernel density analyses and considers the current analytical approach to be appropriate for the intended monitoring objectives. B2Gold Nunavut believes that the existing analytical approach applied here remains appropriate for the intended purpose and suggests that autocorrelation has been accounted for in this approach. While autocorrelated KDA (AKDE) represents one approach for accounting for autocorrelation, temporal thinning is also a widely accepted method for reducing the influence of serially correlated location data in kernel density analyses. B2Gold Nunavut used GPS fixes at daily intervals, which reduces the suggested potential bias introduced by tightly clustered fixes.
- B2Gold Nunavut also notes that the seasonal analyses are based on relatively short time periods (e.g., approximately two weeks during the calving season within a single year). Consequently,

the number of available locations is limited, particularly if analyses are conducted at the individual animal level as suggested by the reviewer. Under these circumstances, the available data may be insufficient to reliably support convergence of AKDE models, and application of AKDE may not necessarily improve the robustness of the resulting estimates. Given these considerations, B2Gold Nunavut considers the current approach to be appropriate for the objectives of the analysis while remaining open to considering alternative analytical methods through the appropriate forums (e.g., CTAG) as new information, tools, and guidance become available.

7.35 KIA #32 (TC45)

KIA Comment & Request/Recommendation

- In the report, it is stated that “Distances from the centroid of the calving season 95% UD polygon to the nearest edge of the Goose PDA and MLA PDA were calculated for both caribou herds to allow tracking of potential shifts year to year.” However, it is possible for ranges with very different shapes and spatial distributions to have similar centroids, even though their actual exposure to disturbance may be completely different. Therefore, relying only on centroid location may oversimplify the spatial relationship between seasonal ranges and disturbance features. This concern is even stronger when the analysis is based on 95% isopleths, because these broader home-range boundaries can be strongly influenced by occasional irregular movements or outlying locations from individual animals. In contrast, smaller isopleths, such as 50% core-use areas, may better represent areas of concentrated use. Therefore, it would be helpful to clarify why centroid-based analysis was considered appropriate.
- Request: The KIA requests the following:
 - Please justify the use of centroids for analyzing caribou range shifts.
 - In addition, it would be informative to conduct the same analysis using core habitat areas based on 50% isopleths.

B2Gold Response

- B2Gold Nunavut appreciates the comment and reiterates the utility of considering the UD centroid location as a representative summary metric of the herd location in each season. We do additionally see the utility in providing additional metrics in addition to the 95% UD centroid distance to ensure all potential aspects of the spatial distribution of caribou are considered in monitoring approaches. As such, B2Gold Nunavut will consider including analysis of distance from the Goose PDA and AKMLA PDA to the 50% UD centroid, the 95% UD centroid, the 50% UD closest point, and the 95% UD closest point in future WMMP reports, following discussion with the CTAG.

7.36 KIA #33 (TC45)

KIA Comment & Request/Recommendation

- In the report, it is stated that “The Bathurst caribou herd 50% UD did not overlap the Goose Project PDAs in any season, and the 95% UD overlapped only during the spring migration season in 2025.” However, as noted in the previous comments, traditional KDE, which was used to map seasonal ranges, often underestimates home-range size. This could make the calculated overlap between the estimated home range and the Project unreliable.

- Request: The KIA requests the following:
Please update the seasonal home range layers after accounting for autocorrelation and recalculate the overlap area using these updated layers. This request is the case for all the herds and seasons considered in the current study.

B2Gold Response

- B2Gold acknowledges the comment and refers the reviewer to the response provided for KIA-NIRB-30 (see Section 7.34).

7.37 KIA #34 (TC45)

KIA Comment & Request/Recommendation

- KDE, and even AKDE, should not be used to map ranges during periods when individuals are not range-resident, because bandwidth estimation based on movement patterns is not appropriate in such cases.
- Request: The KIA requests the following:
 - Please update the seasonal home range layers after accounting for autocorrelation and recalculate the overlap area using these updated layers. This request is the case for all the herds and seasons considered in the current study.

B2Gold Response

- Like the response provided for KIA-NIRB-30, B2Gold Nunavut considers the current analytical approach to be appropriate for the stated objectives of the analysis and for the conclusions being drawn from the results. B2Gold Nunavut acknowledges, however, that the interpretation of these analyses should remain within the context and intended application described in the WMMP Report and should not be extrapolated beyond those purposes without additional supporting analysis.

B2Gold Nunavut recognizes that alternative approaches may provide additional perspectives on caribou movement patterns and remains open to discussing potential methods for presenting spring migration data through the CTAG process. For example, approaches such as migratory line-string analyses may offer complementary insights into movement characteristics and migratory pathways. Any consideration of alternative analytical methods would need to be balanced with the requirements of existing Data Sharing Agreements, including the need to protect sensitive caribou location information by ensuring that exact collar locations are not disclosed.

7.38 KIA #18 (TC46)

KIA Comment & Request/Recommendation

- Project Condition 46 states, “The Proponent shall file an incident report to the local wildlife conservation office for all direct wildlife mortalities that occur in association with the Project. All incident reports should include sufficient detail to demonstrate how monitoring and mitigation measures failed to prevent the mortality, as well as information pertaining to what measures would be put in place to prevent the incident from reoccurring.” The reporting requirements for this condition include, “a description of steps taken in fulfillment

of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board." Page 4-151 of the 2025 annual report states that there were 16 wildlife mortalities at the Goose project in 2025. Of these incidents, only one mortality is reported as due to interaction with infrastructure, a ptarmigan that purportedly hit a window. Of the remaining mortalities, seven were recorded as due to vehicle collision, four to "unknown causes – likely natural" (see Comment KIA-NIRB-19), three to predation, and one to euthanasia (due to habituation; see Comment KIA-NIRB-12).

According to Table 9.2-1 (Page 9-3), 15 of the 16 incidents are listed under the "Reporting" column as "Internally," and the remaining incident, the euthanized fox, is listed under "Reporting" as "Consultation with GN." Section 9.2, page 9-5 states, "All mortality events were recorded and reported internally to Environment Department staff and followed methods and guidelines provided in B2Gold Nunavut's onsite Incidental Wildlife Observations SOP (B2Gold Nunavut 2025k)". There is no indication in the text that any type of report was filed with the local wildlife conservation office for any of the wildlife mortalities.

Section 9 (Page 9-5) of Appendix C states, "In accordance with NIRB Condition #46, incident reports contain sufficient detail to demonstrate how monitoring and mitigation measures failed to prevent the mortality, as well as information pertaining to what measures were put in place to prevent the incident from reoccurring. Incident reporting was conducted for all mortalities, and adaptive management measures were recorded when they were implemented." However, the wildlife incident reports in Appendix I pertaining to deceased animals, including the ptarmigan, do not appear to have any detail regarding how monitoring and mitigation measures failed to prevent the mortality, nor is there any information included regarding what measures could be put in place to prevent reoccurrence. There is no indication if this information is reported elsewhere in the Annual Report or where one could find this information.

- Request: The KIA requests the following:
 - The proponent should include all the required information regarding wildlife mortalities in the annual report, including a root cause analysis (why monitoring and mitigation measures failed to prevent each mortality event) and measures put in place to prevent the incident from reoccurring.
 - In the annual report, the proponent should supply evidence or supporting documentation that wildlife mortalities are reported to the local conservation office as required by the project condition.

B2Gold Response

- The WMMP requires B2Gold Nunavut to document and report mortality events involving wildlife-valued ecosystem component (VEC) species where interactions with Project activities are identified as the cause. These incidents are summarized in the annual WMMP Report in accordance with the reporting requirements of the program.
- Mortality events involving species that are not subject to immediate notification requirements, such as hare or ptarmigan, are documented and included in annual reporting. In contrast, for mortality events involving VEC species such as fox, hawk, or caribou, B2Gold Nunavut notified the Government of Nunavut and the appropriate

Conservation Officer promptly following the incidents and maintained ongoing communication as required.

- B2Gold Nunavut will continue to document and report wildlife mortality events in accordance with the WMMP and applicable regulatory requirements, including timely communication with the relevant authorities where warranted.

7.39 KIA #11 (TC47)

KIA Comment & Request/Recommendation

- Project Condition 47 states, “The Proponent shall, in consultation with the Kitikmeot Inuit Association, develop and implement measures to prevent the use of water attenuation ponds and tailings storage areas by wildlife, including waterfowl, other migratory birds, and caribou, with sufficient monitoring to assess whether these measures are effective or whether further deterrents may be required.” According to page 4-152, construction of the “Primary Pond” was completed in March 2025, and the Echo Tailings Storage Facility (ETSF) started receiving tailings and process water on 15-June-2025. On the row for this project condition in Table A-1 (Terms and conditions, compliance, and document section – wildlife and wildlife habitat) (Page 2) of Appendix A of the WMMP Report, the “Compliance” column states, “As of 2025, the TSF or other on-site ponds have not been constructed at the Mine. As a result, waterbird monitoring in ponds was not completed in 2025 and is anticipated to begin once on-site ponds are constructed at the Project.” These statements in Table A-1 are directly contradicted by statements in the annual report indicating that both a tailings storage facility and the primary pond were completed in 2025. Page 4-153, a continuation of the table outlining PC 47, states that B2Gold Nunavut completed a Standard Operating Procedure (SOP), Monitoring Wildlife Use of Site Ponds SOP (ENV-SOP-1.21; Version E.1, December 2025) that will guide application of mitigations for water attenuation and the TSF. However, this document could not be located for review.
- Request: The KIA requests the following:
 - Please confirm when monitoring of tailings storage and ponds will commence and when pond construction is completed.
 - Please ensure the updated Incineration Management Plan (June 2020) is posted to the NIRB Public Registry.
 - Please ensure the Monitoring Wildlife Use of Site Ponds SOP (ENV-SOP-1.21; Version E.1, December 2025) is posted to the NIRB Public Registry.

B2Gold Response

- B2Gold Nunavut acknowledges KIA’s comment and appreciates the opportunity to clarify the construction and operational timelines associated with the Echo Tailings Storage Facility (TSF) and the Primary Pond. Construction of the Primary Pond was completed in March 2025. Mining activities within the Echo Pit were subsequently completed in May 2025, and the pit began receiving water and tailings as part of its transition to a TSF on or about June 15, 2025. Although construction of the Primary Pond was completed in March 2025, dedicated wildlife-use monitoring was not initiated at that time because the pond contained only freshwater and had not yet received contact water associated with mining activities. Similarly, following the transition of the Echo Pit to a TSF in June 2025, the immediate area remained subject to intensive construction and operational activities. These activities included the installation and commissioning of infrastructure required to convey tailings and contact water to the facility, as well as ongoing crane operations and

heavy equipment use. Given the level of activity occurring in the area, wildlife and bird use of the waterbody was considered unlikely during this period and no wildlife were incidentally observed using the pond.

B2Gold Nunavut would also like to clarify that monitoring for wildlife use of site ponds commenced in spring 2026 and is ongoing. The results of this monitoring program will be presented in the 2026 Annual WMMP Report. B2Gold Nunavut appreciates KIA's interest in the Standard Operating Procedure (SOP) for wildlife Use of Site Ponds. The document is currently being reviewed internally to determine its suitability for submission to the public registry, and B2Gold Nunavut will provide further information on this matter as appropriate.

7.40 KIA #12 (TC48)

KIA Comment & Request/Recommendation

- Project Condition 48 states, "The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities." Part of the plan to reduce attractiveness of project facilities are regular inspections of all waste management areas (WMAs). In 2025, there were 44 inspections at Goose Mine and 20 at the Marine Laydown Area. Inspections are reported in terms of weeks, meaning that there were inspections during 44 weeks at the Goose Mine and 20 weeks at the MLA. Of these weeks, deficiencies were noted in 43/44 (98 %) weeks at Goose and 9/20 (45%) weeks at the MLA. Most of the inspections at Goose recorded several types of deficiencies. For example, inspections on March 29 and 30, 2025, recorded 5 instances of littered waste, 1 instance of a label needing improvement, and 2 instances of misdirected waste. The frequencies and recurring nature of these deficiencies at Goose suggest that the mitigations are either not effective, not well implemented, or both. In addition to repeated deficiencies found during inspections, there were recurring observations of wildlife accessing attractants in 2025. There were four recorded instances of evidence or observation of wildlife accessing attractants during inspections at Goose Mine, two recorded instances of signs of wildlife accessing attractants during inspections at MLA, and at least 12 incidental observations of wildlife interacting with site attractants or waste at project facilities. One fox repeatedly accessed waste, attractants, or other project areas and was not deterred despite hazing efforts, eventually requiring euthanasia due to its habituation. These incidents suggest severe deficiencies in waste management. Also see Comment KIA-NIRB-16 (Section 7.42) for further issues regarding wildlife access to attractants.
- Request: The KIA requests the following:
 - Due to the recurring deficiencies, the proponent should review the waste management plan and provide additional adaptive management and compliance steps regarding wildlife attractants.
 - The proponent should initiate or update personnel training regarding waste management and wildlife attractants, as signage and the existing staff education program do not seem to be effective, and issues have occurred not for several years in this regard.

B2Gold Response

- B2Gold Nunavut acknowledges KIA's concerns regarding recurring waste management deficiencies and wildlife interactions observed at the Goose Mine and Marine Laydown Area (MLA) during 2025. B2Gold Nunavut takes its obligations under Project Condition 48 seriously and remains committed to minimizing wildlife attractants and continually improving waste management practices across the Project. The inspection results reported for 2025 include a range of observations, such as localized litter, improperly sorted waste, and minor labelling deficiencies. B2Gold Nunavut notes that these findings reflect a proactive inspection and reporting program in which even minor observations are documented and addressed. The intent of this approach is to identify and correct issues promptly, support continuous improvement, and reduce the potential for wildlife attractants to develop on site.

B2Gold Nunavut recognizes that effective management of wildlife attractants in remote northern environments can present ongoing challenges. Most wildlife interactions reported during 2025 involved red foxes (*Vulpes vulpes*), a species known for its opportunistic foraging behaviour and ability to exploit available food resources associated with human activities. As a result, even minor waste management deficiencies have the potential to attract wildlife and reinforce habituated behaviours if not addressed promptly. B2Gold Nunavut also notes that the habituated fox that was ultimately euthanized was frequently observed in and around the underground portal and associated operational areas. The location and behaviour of these individual presented challenges for implementing wildlife deterrence measures and reducing interactions with Project activities. In response to observations from 2025, and consistent with KIA's recommendations, B2Gold Nunavut has implemented several enhancements to both waste management practices and compliance oversight at the Goose Mine and MLA. These measures are intended to strengthen accountability, improve waste handling practices, and further reduce opportunities for wildlife attraction.

- **Daily Visual Inspections**
The Environment Team has increased inspection frequency from weekly reviews to daily visual inspections of waste collection areas to identify and address waste management concerns in a timely manner.
- **Infrastructure Upgrades**
New heavy-duty waste containment bins have been installed in high-traffic areas at both the Goose Mine and MLA to improve waste containment and support proper waste segregation.
- **Enhanced Site Signage**
Additional high-visibility signage has been installed at waste disposal locations to provide clear guidance on waste segregation requirements and disposal procedures.
- **Education and Training**
The Environment Team has expanded awareness and training initiatives for both new and existing personnel, emphasizing the link between proper waste management, wildlife attractants, and the prevention of wildlife habituation.
- **Compliance and Accountability Measures**
In consultation with site leadership, B2Gold Nunavut has strengthened accountability measures related to waste management practices. These measures

are intended to reinforce training objectives and ensure that waste management requirements are consistently followed across the Project.

B2Gold Nunavut will continue to evaluate the effectiveness of these measures through ongoing inspections, wildlife observations, and annual WMMP reporting, and remains committed to adaptive management and continuous improvement in wildlife attractant management.

7.41 KIA #13 (TC48)

KIA Comment & Request/Recommendation

- Deficiencies in building and skirting inspections were noted and require corrective action. Project Condition 48 states, “The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities.” Building and skirting inspections are performed to determine if mitigation measures to exclude furbearers are effective. In 2024, over 35 instances of open seacan doors were reported over the course of 37 weeks (inclusive of both Goose and MLA) where inspections were performed (Figure 2.7-1, 2024 WMMP Report, Page 2-24). The review of the 2024 Annual Report noted this problem and requested additional adaptive management steps to address the issue. In 2025, however, nearly 100 instances of open seacan doors were recorded over the course of 64 weeks (inclusive of Goose and MLA) of inspections (Figure 2.7-1, 2025 WMMP Report, Page 2-27). While the additional instances in 2025 could be the result of more frequent inspections, the recurring issue suggests that this is an ongoing and large-scale problem. Other than open seacan doors, 2025 inspections recorded nearly 80 instances of damaged or missing skirting over the 64 weeks (inclusive of Goose and MLA) of inspections (Figure 2.7-1, 2025 WMMP Report, Page 2-27). This is a drastic increase from 2024, when there were fewer than 5 recorded instances of missing or damaged skirting detected during inspections (Figure 2.7-1, 2024 WMMP Report, Page 2-24). Inspections also detected one instance of wildlife denning under a seacan. Incidental observations of wildlife recorded three instances of foxes accessing under buildings or seacans, although one report could be a duplicate of the denning animal detected during inspections. The frequency of skirting issues and recorded instances of wildlife accessing the areas underneath buildings and seacans should be addressed. For the animal denning under the seacan, the WMMP reports that gravel was placed at the base of the seacan to prevent animals accessing underneath the seacan, but there is no mention of if this mitigation was effective.
- Request: The KIA requests the following:
 - Due to the recurring deficiencies, the proponent should review the policies regarding open seacan doors and the procedures around maintaining skirtings and provide additional adaptive management steps for each.
 - Please provide indications if mitigations were effective, in this case the gravel placed around a seacan to prevent denning.

B2Gold Response

- B2Gold Nunavut acknowledges KIA’s concerns regarding wildlife attractants and denning prevention. Reducing the potential for wildlife interactions with site infrastructure remains a priority and requires coordination between environmental personnel, site operations,

logistics teams, and contractors. While the Environment Department provides regulatory oversight, wildlife monitoring, and wildlife awareness training, the day-to-day management of sea-can and other site infrastructure is the responsibility of operational and logistics teams. In response to the observations identified during inspections, the Environment Department has worked with Site Operations to reinforce expectations regarding infrastructure management, including adherence to the site's closed-door policy. Compliance with these requirements will continue to be emphasized through daily toolbox meetings, particularly during periods of heightened wildlife activity. Where repeated non-compliances are identified, even for minor issues such as the ones mentioned above, these observations will be communicated to site leadership and addressed through established accountability processes.

Maintenance of skirting and other physical barriers around trailers, buildings, and related infrastructure is managed by the Site Services team. The Environment Department will continue to identify and document areas where skirting has been damaged, compromised, or is otherwise ineffective during routine environmental inspections. Identified deficiencies are recorded within the site tracking system and communicated promptly to the responsible area owner to ensure timely corrective action. Should routine controls, such as door compliance and maintenance of skirting, prove insufficient to address recurring issues.

B2Gold Nunavut will implement adaptive management measures as appropriate. These measures may include:

- **Level 1:** Increased environmental inspection frequency in areas where recurring issues have been identified.
- **Level 2:** Formal internal non-conformance reporting to department managers responsible for the affected infrastructure.
- **Level 3:** Installation of additional physical deterrents or exclusion measures, such as temporary heavy-duty mesh or other barriers, where permanent repairs cannot be completed immediately due to operational or seasonal constraints.

The placement of coarse gravel or rock fill around selected sea-cans has also been implemented as a preventative measure to reduce the suitability of these areas for burrowing or denning wildlife. B2Gold Nunavut recognizes that gravel placement is most effective when used in conjunction with well-maintained infrastructure and the elimination of gaps between structures and the ground surface. The Environment Department will continue to monitor these locations through routine inspections and evaluate the effectiveness of this measure over time. Where warranted, the use of similar preventative measures may be expanded to other high-risk storage and infrastructure areas as part of the site's ongoing wildlife attractant management program.

7.42 KIA #16 (TC48)

KIA Comment & Request/Recommendation

- Project Condition 48 states, "The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities." The on-site camera monitoring program is designed to monitor wildlife activities around project infrastructure. As such, some cameras were deployed near areas potentially attractive to wildlife, such as

waste management facilities (e.g., incinerators, landfill). Section 2.8.2 (Page 2-31) reports the number of wildlife detections, including for wildlife species, “commonly associated with being attracted to waste (i.e., red fox, small mammals, grey wolf, and common raven).” This section also reports that 19% of wildlife detections depicted wildlife interacting with project infrastructure. However, the report does not indicate how many or what proportion of those detections occurred at potential wildlife attractants, nor what those interactions included, except for a high proportion of detections of common ravens, “as they were frequently photographed perched on buildings and waste bins.” Due to the issues regarding waste management and wildlife accessing attractants (see Comment KIA-NIRB-12), understanding what wildlife species and interactions were recorded, and where, may be important information to consider for proper mitigations and to further assess compliance.

- Request: The KIA requests the following:
 - Please clearly describe what species of wildlife were detected, where detections occurred, and what wildlife were doing in those detections, especially as it relates to waste management and wildlife access to attractants. This information may be best provided in a table. Include the number of each type of detection

B2Gold Response

- B2Gold Nunavut provides the following clarification regarding the objectives of the on-site camera program and the reporting of wildlife interactions with Project infrastructure. The on-site camera monitoring program is intended to supplement wildlife attractant monitoring by capturing wildlife activity around Project infrastructure, including waste management facilities and other areas where wildlife interactions may occur outside periods of direct observation. This program provides an additional line of evidence to support the identification and assessment of wildlife use of the site. Table 2.8-1 of the WMMP Report identifies all camera monitoring locations, including cameras situated near infrastructure that may have the potential to attract wildlife, such as waste management facilities. Wildlife detections recorded at each camera location are summarized in Table 2.8-2.

Wildlife species observed interacting with Project infrastructure during the reporting period included raven, red fox, caribou, ptarmigan, small mammals, and Arctic hare. Additional information regarding these observations is provided throughout the WMMP Report. For example, raven observations are summarized on page 2-32, which notes that Common Ravens accounted for 92% of all detections and were frequently observed perched on buildings and waste bins. Information regarding red fox interactions is provided in Section 5.4.2, while caribou interactions are discussed in Section 3.6.2. As noted on page 3-23, caribou were recorded interacting with infrastructure on three occasions in 2025, including one observation of two caribou in proximity to vehicles and two observations of caribou occurring within the camp area. Detailed descriptions were not provided for all observations involving ptarmigan (n = 3), small mammals (n = 2), and Arctic hare (n = 1), as these represented a limited number of observations involving common species and were not considered to indicate notable interactions with Project infrastructure. Given the large volume of camera data collected during the reporting period (1,898 total detections), providing a detailed description of every individual observation within the annual report would not be practical. Instead, observations are summarized and reported in a manner intended to highlight key patterns, notable wildlife interactions, and relevant findings from the monitoring program while maintaining a concise and accessible reporting format.

B2Gold Nunavut will continue to evaluate opportunities to improve the presentation of camera monitoring results in future WMMP reports.

7.43 KIA #17 (TC50)

KIA Comment & Request/Recommendation

- The information in this table in Appendix G appears to be haphazard or perhaps organized alphabetically in the comment column. Organizing by date, whether alone or in conjunction with species or location (e.g., first organizing by species, then chronologically within a species category), would improve evaluation and understanding of the table. If the table is compiled by appending different types of reporting to each other, such as incidental observations from flights appended to reports from the winter ice road, table subheadings should be used and observations organized chronologically within the subheadings to specify the source of the information and to aid the reader in understanding. Table notes could also be utilized to explain the structure of the table and the information source(s).
- Request: The KIA requests the following:
 - Please organize Appendix G in some logical manner and inform the reader of such organization to aid in understanding.

B2Gold Response

- B2Gold acknowledges the reviewers for their suggestion and will incorporate this request in the 2026 annual WMMP Report.

7.44 KIA #19 (TC50)

KIA Comment & Request/Recommendation

- Project condition 50 requires a section of the annual report to include , “A detailed analysis of wildlife responses to operations with emphasis on wildlife behaviour, mortalities, and displacements (if any), and responses to project operations.” Appendix G, Incidental Wildlife Observations, includes several entries regarding distressed or deceased wildlife. There are four entries regarding distressed caribou and three entries regarding deceased birds that are of particular concern:
 1. A caribou was seen by the fueling station near Umwelt pit on 15-August and described as, “Animal clearly suffering and in distress. Laying in middle of road having a fit. Twitching.” These symptoms are associated with severe, acute medical crises, including potential poisoning, trauma, or disease. No additional information is given in regard to potential causes of these symptoms, if this incident was monitored, or any follow-up on the animal’s condition.
 2. A caribou was seen near Llama 6 pack camp on 22-October-2025 and described as, “Animal observed to be limping (suspected brucellosis).” Brucellosis is a contagious disease that can infect humans. As with (1) above, there is no monitoring or follow-up regarding this individual. No symptoms other than limping are recorded that led the observer to suspect brucellosis, nor other potential causes of its condition, such as impact or entanglement.
 3. A caribou was seen near Goose airstrip on 17-November and described as, “Injured. Barely moving head, lying down, not moving from spot. Not Alert.” Similar to (1) above, these observed symptoms could mean significant injury, poisoning, or

- disease, yet no information regarding potential causes is provided and no monitoring or follow-up appears to have occurred.
4. An apparently injured caribou was observed on 15-August at the Lower camp Exploration and described as, “Laying down, got up and limped away. Limping badly, leg seemed twisted, possible front right.” No follow-up is available or additional information regarding how this caribou could have been injured, such as entanglement or impact.
 5. A ptarmigan (hereafter referred to as ptarmigan 1) was found at the airstrip on 21-May and described as, “Mortality, appears the bird flew into the window or the building and then died after. Laying on ground dead.” No additional information is provided. No evidence or narrative supporting the conclusion of a window strike is provided, conditions leading to the incident, or measures to prevent the incident from recurrence (see comment KIA-NIRB-18). In Table 9.2-1, the cause of death for ptarmigan 1 is listed as “Hit Window.”
 6. A ptarmigan (hereafter referred to as ptarmigan 2) was found at the airstrip on 31-August and described as, “Mortality, unknown/natural causes. Found by the site services deceased inside a containment near the security tent.” It is unclear what is meant by “inside a containment,” such as if ptarmigan 2 was entangled or entrapped within a structure or storage container. No determination of the cause of death is provided or investigated. No necropsy was performed and no follow-up information provided. In Table 9.2-1, the cause of death for ptarmigan 2 is listed as “Unknown – Natural Causes.”
 7. A rough-legged hawk found on 18-May at the WIR construction laydown is described as: “Mortality, unknown/natural causes. Report received of an injured bird sitting on the road by the southern WIR laydown. ENV mobilized and observed it to be a rough legged hawk. Bird appears sick but physically uninjured (can spread its wings). Superintendent moved bird with leather gloves and moved it out of harm’s way. Env. monitoring. COs notified via email. Bird appeared 'healthy' for a short time when it was reassessed as it was more active. Later in afternoon upon return Env. Superintendent observed it to be in poor condition (head tucked in under wing). Area had been cordoned off once moved to keep workers out of that area. Later confirmed to be deceased, Received phone call about injured bird in the laydown. Upon arrival, no visible injuries were noticed. Bird seemed lethargic. Eyes were dilated and head would shake fast when it tried to open its eyes. Tried to get the bird to move to a safe spot and he would not move. Monitored the bird throughout the day. Around 4:30 pm bird was no longer able to stand on its legs and head tucked into its wings. We tried to get it to move, and it would very slowly respond to noise.” Symptoms such as those described here could be from disease, injury, poisoning, or starvation. No additional information is provided, such as the bird’s body condition, a post-mortem examination, necropsy, or potential causes of the bird’s distress. In Table 9.2-1, the cause of death for the rough-legged hawk is listed as “Unknown – Natural Causes”

These incidents are concerning in part due to the lack of any type of investigation into the potential causes or sources of the conditions of these animals. In previous reviews of annual reports, the KIA has requested necropsies be done and has received positive responses from the proponent for pursuing them when necessary. Without understanding the circumstances surrounding the animals being in the

observed condition, there is no opportunity to enact measures to prevent recurrence. In addition, evaluating whether or not project activities, facilities, etc., could have been a contributing factor for the conditions of these animals is important to document and report to ensure compliance with the condition of detailed analysis of wildlife responses to operations. Section 9, Page 9.1, states that an incident is defined as “an interaction where there is an active deterrent action, or if direct harm, injury, damage, or wildlife mortality occurs.” Presumably because they were found deceased, Appendix I, Wildlife Incident Reports, includes some additional information regarding the rough-legged hawk (number 7 in the list above) and ptarmigans (5 and 6 in the list above):

- Rough-legged hawk: “Report received of an injured bird sitting on the road by the southern WIR laydown. ENV mobilized and observed it to be a rough legged hawk. Bird appears sick but physically uninjured (can spread its wings). Superintendent moved bird with leather gloves and moved it out of harm’s way. Env. monitoring. COs notified via email. Bird appeared 'healthy' for a short time when it was reassessed as it was more active. Later in afternoon upon return Env. Superintendent observed it to be in poor condition (head tucked in under wing). Area had been cordoned off once moved to keep workers out of that area. Later confirmed to be deceased.” There is no information regarding whether this hawk was incinerated.
- Ptarmigan 1: “Got a call from someone up at the airstrip about a dead bird. Upon arrival I found the bird laying on the ground beside a building beside the airstrip. It appears the bird flew and hit the building or the window on the building and died. Bird was brought to the incinerator to be cremated.”
- Ptarmigan 2: “Site services found a deceased ptarmigan in a secondary containment near security tent at the airstrip. Carcass was recovered and brought to the incinerator for disposal.”

Due to the uncertainty surrounding the cause of death for each of these birds, they should have undergone a necropsy to gather more information regarding their conditions. The KIA has requested necropsies be done in previous years, and it is unclear what, if any, policy or procedure there is regarding necropsies for animals found deceased.

- Request: The KIA requests the following:
 - For wildlife observed in obvious distress, including for suspected disease, record and report all pertinent information including symptoms, surrounding area, proximity to project facilities and / or activities, etc., to evaluate potential contributing factors and mitigations. If an animal is suspected of having a disease or condition, explain what led to such a conclusion.
 - For wildlife observed in distress, record and report if a follow-up on the animal’s condition occurred and the observations of said follow-up.
 - Consider developing a procedure to perform field necropsies or submit carcasses for necropsy of any wildlife species found deceased. This has been requested in previous years, and it was out understanding that this would be done.

B2Gold Response

- B2Gold Nunavut remains committed to minimizing Project-related impacts on wildlife and takes all observations of wildlife in distress seriously. All relevant observations and information associated with the incidents referenced by the reviewer were documented and reported to the Government of Nunavut (GN) as appropriate. In some cases, opportunities for follow-up monitoring are limited by the movement patterns and behaviour of the animals involved. For example, when caribou were observed exhibiting signs of distress, the individuals did not always remain within the Project area for extended periods and subsequently moved beyond the area where further observations could be made. As a result, long-term follow-up was not always possible. With respect to the rough-legged hawk mortality, the appropriate Conservation Officer was contacted following the incident. B2Gold Nunavut offered to provide the carcass to the GN for necropsy; however, a request for collection was not received. The carcass has been retained in frozen storage by B2Gold Nunavut to preserve the opportunity for future examination should a regulatory agency, researcher, or other qualified party wish to conduct a necropsy.
- B2Gold Nunavut continues to make wildlife carcasses available for necropsy where appropriate and remains supportive of further investigation into wildlife mortality events. While B2Gold Nunavut personnel do not have the specialized expertise, infrastructure or authority required to perform wildlife necropsies, the company is committed to documenting incidents, preserving specimens where feasible, and facilitating access for qualified parties interested in conducting further analysis.

7.45 KIA #22 (TC50)

KIA Comment & Request/Recommendation

- Project Condition 50 requires that the annual report include, “A detailed analysis of wildlife responses to operations with emphasis on wildlife behaviour, mortalities, and displacements (if any), and responses to project operations.” Section 3.5 describes caribou behavioural monitoring in 2025, which is designed to test FEIS predictions that caribou may be disturbed by activities at Goose Project, specifically noise. The authors describe scan surveys, which are 30 minutes in duration subdivided into 3-minute segments. Section 3.5.1 mentions that survey conditions were recorded, such as weather, group composition, distance to observer, and road structure, but there is no mention of if the surveys occurred over various times of day, different weather conditions, or other circumstances that are also potential sources of variation. Observations should occur over a range of conditions and be properly analyzed to ensure any conclusions drawn from surveys are accurate and reliable. If any potential disturbance occurred during a behavioural survey, then the type of disturbance and how long it took from the disturbance to when the caribou returned to baseline behaviours was also recorded. Section 3.5.2 states that for some surveys conducted along the WIR that the potential disturbance was from the survey vehicle. However, the text does not describe under what circumstances that the survey vehicle would or would not be considered a disturbance. Since the vehicle was not consistently considered a disturbance, understanding when and why it would be a disturbance is important to define. In addition, in cases when the vehicle was considered a disturbance, it is not described how the baseline was established nor how to determine when the behaviour returned to baseline if the observer presence was the disturbance from the outset of observations.

Section 3.5.2 partially outlines the results of the behavioural surveys, stating there were 26 caribou surveys at Goose Mine and seven from the WIR. For the surveys from the WIR, the authors summarize the results, specifically the time taken for the observed caribou to return to baseline conditions after a disturbance, stating, “caribou in all WIR surveys returned to baseline behaviours within four survey intervals (12 minutes or less), with the majority of caribou in each group returning to baseline behaviours within two intervals (6 minutes or less).” No such summary is presented for the surveys at Goose Mine. In addition, the time to return to baseline conditions during surveys when a disturbance occurred are not reported in Table 3.5-1.

- Request: The KIA requests the following:
 - Please confirm that the behavioural observations occurred over a range of conditions for variables that may also affect caribou behaviour.
 - Please describe under what conditions the survey vehicle would be considered a disturbance or how it would be determined if the vehicle was causing a disturbance to caribou.
 - For instances where the survey vehicle was the disturbance, please describe how a baseline condition was established and how a return to baseline was evaluated.
 - Please report the time taken to return to baseline conditions for all surveys when a disturbance occurred.

B2Gold Response

- B2Gold Nunavut acknowledges the reviewer’s comments regarding the behavioural monitoring program and provides the following clarification regarding survey implementation and interpretation of results.
 - Behavioural surveys were conducted when caribou groups were observed sufficiently close to the mine site to allow Environment staff to safely and effectively complete observations. Surveys were not restricted to specific times of day or weather conditions. Information such as survey timing, weather conditions, and additional field observations were recorded to provide context for interpreting survey results. For example, during 2025, surveys were conducted between approximately 08:00 and 17:00 and under temperatures ranging from 20°C to -37°C.
 - Prior to initiating behavioural observations, surveyors generally implemented a 15-minute waiting period to allow caribou behaviour to return to baseline conditions following their arrival at the observation location. Where the full waiting period could not be completed, survey vehicles were considered a potential source of disturbance and this was documented accordingly. Situations where the full waiting period was not feasible included operational constraints, safety considerations associated with prolonged roadside observations, or circumstances where caribou were moving and were expected to leave the field of view before the waiting period concluded.
 - The cumulative results reported for 2025 are presented qualitatively due to the relatively limited sample size available to date (55 behavioural observations collected over three years). While the current dataset is not considered sufficient to support robust statistical analysis, it provides valuable monitoring information and will continue to be incorporated into future reporting. As additional data are

collected, B2Gold Nunavut intends to evaluate potential trends in caribou behavioural responses to environmental and Project-related stimuli.

7.46 KIA #23 (TC50)

KIA Comment & Request/Recommendation

- The reporting of incidental caribou observations is confusing. For example, Section 3.9.2, Page 3-26 states that onsite personnel observed caribou on 90 occasions. Page 3-28 reports that there were 48 sightings of caribou at Goose Mine, 21 at the MLA, and 27 along the WIR. Adding the sightings for these three categories (48 + 21 + 27) is 96, more than that reported on Page 3-26. It is unclear the reason for this discrepancy, such as if the 90 observation occasions means 90 different dates, or if onsite personnel are defined differently such that some of the WIR observations would not be counted as “onsite.”
- It is unclear how the seasonal dates are defined in this section. The date ranges in Table 3.9-2 (Page 3-27) do not match up with the seasonal dates given in Table 3.4-1 (Page 3-12). For example, Table 3.9-2 states that Calving season is June 5 – June 15, but Table 3.4-1 gives Calving season dates as June 2-16 for the Bathurst Herd and June 6-19 for the Beverly/Ahiak Herd. As a result, it is unclear if the seasonal counts given in the text and tables are relevant to the specified seasons.
- Request: The KIA requests the following:
 - Please ensure that the narrative regarding caribou incidental observations reporting accounts for all detections and dates, that the counts match and add up between the text and tables, and that how the seasons are defined is clearly outlined in the text, figures, and tables.

B2Gold Response

- B2Gold Nunavut acknowledges KIA’s comments regarding the reporting of incidental caribou observations and provides the following clarification. A total of 96 incidental caribou observation events were recorded in 2025. These observations were made by both onsite personnel and wildlife biologists during routine site activities and WMMP monitoring programs. Each observation event represents a documented sighting of caribou and is recorded as a single observation occurrence for reporting purposes. As described on page 3-26 of the WMMP Report, the 96 observation events consisted of 90 observations reported by onsite personnel and 6 observations recorded by wildlife biologists. Table 3.9-2 presents a consolidated summary of all incidental caribou observations collected during 2025, incorporating records from both sources. The dates presented in Table 3.9-2 correspond to the dates on which the observation events occurred and are used to summarize and report incidental caribou sightings by season throughout the WMMP Report. This approach provides a consistent framework for summarizing observations and seasonal patterns in caribou occurrence.

7.47 KIA #24 (TC50)

KIA Comment & Request/Recommendation

- The basis for the estimated number of individuals is unclear, as no rationale or consistent methodology has been provided. In addition, some entries appear to be inaccurate. For example, on page 5–8 it is stated that “wolverine were observed 12 times, all being of one

individual”; however, the corresponding table reports an estimated 12 individuals. For clarity and consistency, it is recommended that the proponent either: (1) provide a clear rationale and methodology for estimating the number of individuals for each species; or (2) remove the column if such estimates cannot be reliably supported.

- Request: The KIA requests the following:
 - Please revise the table using one of the above methods for clarity.

B2Gold Response

- B2Gold Nunavut acknowledges that the presentation of incidental wolverine observations in the WMMP Report may have created some ambiguity and appreciates the opportunity to clarify the reporting approach. In 2025, a total of 12 wolverine observation events were recorded, with each observation involving a single wolverine. As is common with incidental wildlife observations collected over time, it is generally not possible to determine whether repeated sightings represent the same individual or multiple individuals unless unique identifying characteristics are present. Consequently, the 12 observation events cannot be definitively attributed to specific individuals, nor can they be interpreted as representing 12 separate wolverines. Rather, the data indicate that a single animal was observed during each of 12 separate observation events throughout the reporting period. B2Gold Nunavut recognizes that this distinction was not communicated as clearly as intended in the WMMP Report and will seek to improve the wording and presentation of incidental wildlife observations in future annual reports to ensure the reporting approach is more readily understood.

7.48 KIA #25 (TC57)

KIA Comment & Request/Recommendation

- Pit and quarry wall nest monitoring was completed in 2025 at the Echo Pit, Llama Lake, and Umwelt Pit, as these sites currently have walls tall enough to potentially support cliff nests. At the three sampling sites, roughly half as many surveys were conducted at Umwelt Pit (n=17), compared to Echo Pit (n=31) and only a single survey was conducted at Llama Lake (n=1). Please provide additional details explaining the disparity in survey effort among sites, including whether this was due to operational factors (e.g., a pit not being in use), differences in habitat quality and size, or other reasons.
- Request: The KIA requests the following:
 - Please provide an explanation for the observed disparity in survey effort among the three sites.

B2Gold Response

- B2Gold Nunavut acknowledges KIA’s comments regarding variation in survey effort among pit locations and provides the following clarification. Survey effort differed among pits due to variations in construction status, pit wall development, operational activities, and the resulting potential for raptor use. For example, one survey was conducted at the Llama Pit in early spring before major construction activities had commenced. Subsequent site observations confirmed that pit development was incomplete and that conditions were not suitable for raptor nesting; therefore, additional dedicated surveys were not considered necessary during the reporting period. The lower number of surveys conducted at the Umwelt Pit relative to the Echo Pit was

also influenced by site-specific conditions. In particular, the comparatively low pit wall height, high levels of operational activity, and frequent blasting reduced the likelihood of raptor nesting and use within the area. Consequently, survey effort was focused on locations considered to have a higher potential for wildlife use. Despite the reduced number of dedicated surveys at the Umwelt Pit, visual inspections of the pit walls were conducted opportunistically during surveys of the Echo Pit to verify whether any evidence of raptor activity was present. No raptor activity requiring additional follow-up was observed during these inspections. B2Gold Nunavut recognizes the value of providing additional context regarding survey effort and survey rationale and will include further details in future annual WMMP reports where necessary to improve transparency regarding the factors influencing monitoring effort at individual pit locations.

7.49 KIA #15 (TC60)

KIA Comment & Request/Recommendation

- Project Condition 60 states, “Subject to safety requirements, the Proponent shall ensure that project aircraft maintain sufficient cruising altitudes to avoid disturbance to migratory birds. In particular, the Proponent shall maintain appropriate altitudes in proximity to observed concentrations of migratory birds, caribou and muskoxen that may be encountered during aircraft flights to the George property and other exploration areas, as well as during the transfer of employees between project facilities.” The WMMP Report describes an attribute-driven 3-dimensional distance model summary used to determine the three-dimensional distance between caribou collar points and helicopter locations during flights. The intent was to compare the modelled vertical and horizontal distances between helicopter locations and caribou collar locations to the caribou flight setback distances to evaluate adherence to these setbacks. The results are presented as a narrative summary that does not provide significant detail to allow the reader to fully understand the deviations found via the model. For example, the model indicated there were 53 helicopter points that violated the prescribed horizontal setback distance and 13 of these points also violated the vertical setback. It is not stated in the narrative at what time of year these discrepancies occurred, nor how many flights included such discrepancies (e.g., 53 flights with one discrepancy each, versus 2 flights with 23 and 30 discrepancies each, etc.). The accompanying Figure 2.4-1 shows flight lines for those flights that included points violating both horizontal and vertical setbacks color-coded by time of year but does not indicate how many flights occurred during which season. It would help to identify if there were times of year when more setback discrepancies occurred, since setback distances (and helicopter use) vary depending on the time of year. It is important to note that the methods for the 3D model state that the comparison of flight lines and caribou locations were completed for a 24-hour period and do not indicate caribou were present at the time of the flight. Due to this limitation, the model as currently structured does not allow for determination of compliance.
- Request: The KIA requests the following:
 - Please include a table of results for the 3D model to clarify the number, location, and any other pertinent information of flights with points less than the setback distances.
 - Please include sample size (e.g., the number of flights) for each color-coded season in Figure 2.4-1.

- Include in the results summary pertinent information such as how many flights indicated discrepancies in setbacks.

B2Gold Response

- It should be noted that B2Gold Nunavut has been working on methods to easily visualize helicopter data, but that there are few options for an intuitive graphic of these data. B2Gold Nunavut acknowledges the KIA's comment regarding reporting additional information related to helicopter flights. B2Gold Nunavut will investigate the possibility of including these recommendations in future WMMP reports

7.50 KIA #52 (TC70)

KIA Comment & Request/Recommendation

- KIA understands that 2025 was a transitional year between construction, commissioning and production; however, KIA would like to see the percentage of Inuit in skilled positions and supervisory positions increase including ED's, senior managers, middle management and specialized professionals.
- Request: Please describe how B2Gold Nunavut's Career Development Plans are being designed to increase the percentage of Inuit in skilled and supervisory positions. Please describe all the steps taken to date by B2Gold in development of apprenticeship programs for Inuit including pairing Inuit with Red Seal holders, community partnerships, securing funding, and training delivery. Has there been an effort to gain employees from the diamond mines that are closing or have recently closed

B2Gold Response

- Per IIBA Schedule 8.1, Section 2(d), Career Development Plans (CDPs) are created for each interested Inuit employee at the Mine and serve as an important means for Inuit to plan the next steps in their careers, including potential advancement into skilled professional or management positions. These plans identify the necessary skills and experience to be developed and identify any training required before advancing further. Two main types of CDP can be pursued: 'Vertical' or 'Horizontal'.
 - 'Vertical' CDPs typically focus on one of the following:
 - Leadership development (e.g. establishing a career path from frontline worker -> lead hand -> supervisor -> superintendent -> manager)
 - Specialist development (e.g. establishing a career path from frontline worker -> skilled worker -> professional -> skilled professional)
 - 'Horizontal' CDPs will typically focus on one of the following:
 - Same position (e.g. further growth within the current role to enhance capabilities)
 - Alternate position (e.g. interdepartmental movement to different occupational stream)

Once the type of CDP to be developed for an employee is determined, the process for developing them can be summarized as follows:

1. Employee and Human Resources build a CDP. Human Resources develop gap analysis.
2. Human Resources and Supervisor review CDP and make any adjustments.
3. Employee agrees to CDP (or further adjustments may be made).
4. Human Resources produces final CDP.
5. Department Head approves CDP.
6. Allocation of resources to implement CDP

Resources may be allocated to implement a CDP in the following areas:

- Experiential (e.g. assignment of specific alternate work duties within principal role; appointment of a dedicated mentor (senior qualified staff) in target position; promotion to an interim role with partial authority of target position).
- Academic (e.g. participation in a specific course to enhance knowledge in a theoretical area; enrollment in a post-secondary certificate, diploma or degree; engagement in industry course work required to obtain a professional credential).
- Professional credential (e.g. support in obtaining and maintaining a relevant professional credential).

Each CDP will include information on the type of plan being pursued, current employee/employment information, target position, anticipated timelines, and details of actions that will be taken to execute the CDP. B2Gold Nunavut has held several discussions with the Career Services team at the Government of Nunavut to help in the design of its training programming, specifically apprenticeship training. Further, B2Gold Nunavut has been engaged with the KIA through the Inuit Employment Working Group to develop the Back River Inuit Training Program, which includes an apprenticeship training program. B2Gold Nunavut has also attended several employment-focused sessions hosted by Rio Tinto (e.g., Diavik Mine) related to human resource matters and closure of facilities in the NWT.

7.51 KIA #53 (TC70)

KIA Comment & Request/Recommendation

- On page iv of the Executive Summary, B2Gold Nunavut states that they “anticipate(s) Inuit employment will grow as operations advance and become more routinized, and the success of Company initiatives in this area are realized.” Section 4.1.1 reports that the average Inuit workforce in 2025 was 10.7% for the Goose Mine, compared to 16.6% at Meadowbank and 15.1% at Mary River. Section 4.3.1 mentions a Priority Recruitment Strategy for increasing hiring of Inuit workers and Retention Strategy for reducing turnover. Information on KPIs for these measures are not reported. KIA believes that this number can be improved and can reach the higher levels at Meadowbank and Mary River.
- Request: Please provide information to KIA on the Priority Recruitment Strategy and other plans to increase the Inuit workforce during operation, including any KPIs that have been set to evaluate progress.

B2Gold Response

- B2Gold Nunavut's Priority Recruitment Strategy is included as a component of its Inuit Human Resources Plan (NIRB PRI# 355413). The intent of this Strategy is to maximize the engagement of Kitikmeot Inuit in the Mine workforce through hiring initiatives and regular

information updates on employment and training opportunities, hiring plans, and Mine schedules. This process utilizes both formal targeted communications as well as informal means to provide employment information to local communities. The Inuit Human Resources Plan identifies targeted outcomes and management actions to help ensure the Strategy is successful. In addition, several indicators are included in B2Gold Nunavut's Socio-Economic Monitoring Program to regularly evaluate progress in this area, including:

- Number of Mine personnel (by total, origin, gender, and ethnicity)
- Hours worked by Mine personnel (by total, origin, gender, and ethnicity)
- Inuit employment by job category
- Turnover rate (by gender and ethnicity)

Further, B2Gold Nunavut regularly tracks community perspectives on this topic through its work with KIA, the Company's community engagement program, and initiatives like the Mine's bi-annual Inuit Personnel Survey.

7.52 KIA #54 (TC70)

KIA Comment & Request/Recommendation

- There were 6 Inuit promotions in 2025 at the mine, and 93 non-Inuit promotions in the same year.
- Request: Please provide these numbers as a percentage of Inuit and non-Inuit employees. Please explain the nature of the promotions received by Inuit.

B2Gold Response

- There were seven (7) Inuit promotions in 2025 at the Mine (representing 4% of all Inuit employees), and 93 non-Inuit promotions in the same year (representing 6% of all non-Inuit employees). All Inuit employees who were promoted began in unskilled positions and were promoted to semi-skilled positions. Five (5) of these promotions were to underground mining positions, one (1) promotion was to a haul truck operator position, and one (1) promotion was to a sample preparation position.

7.53 KIA #55 (TC73)

KIA Comment & Request/Recommendation

- KIA would like the Kitikmeot Junior High and High School Achievement Awards Program to also support urban Kitikmeot Inuit; however, the 2025 report notes that the program prioritizes providing awards to Kitikmeot-based Inuit Students that the award is equally split between the Kitikmeot communities. KIA acknowledges the additional information provided on awards from B2Gold Corp. which are open to young Canadian mining talent but not specific to Kitikmeot.
- Request: Please provide more information about whether the Kitikmeot Junior High and High School Achievement Awards Program supports urban Kitikmeot. If not, please provide an explanation as to why.

B2Gold Response

- The Achievement Awards Program is outlined in the Back River Inuit Impact and Benefit Agreement (IIBA) at Schedule 8.1. The IIBA states that these awards are for “**junior high and high school**”. B2Gold Nunavut is happy to have a discussion on expansion of this program to support urban Inuit and believes that discussion should be had at the IIBA Implementation Committee level.

7.54 KIA #56 (TC73)

KIA Comment & Request/Recommendation

- B2Gold Nunavut stated that, moving forward, “second language training opportunities would be communicated to employees via cultural awareness training sessions, and other onsite opportunities held by the Indigenous & Northern Affairs team”. KIA would like to find out more about how these courses are communicated to employees. KIA is also interested in reviewing B2Gold Nunavut’s Glossary of Terms that has been circulated at the mine.
- Request: Please provide the additional information requested above.

B2Gold Response

- Second language training courses are communicated to employees via onboarding training and through relevant employee engagement sessions. B2Gold Nunavut would be pleased to provide KIA with the Glossary of Terms if requested to do so.

7.55 KIA #57 (TC77)

KIA Comment & Request/Recommendation

- The report states that B2Gold Nunavut is in the process of developing updated video-based cross-cultural training for Mine employees and contractors. KIA awaits this updated training.
- Request: Please provide the updated video-based training to KIA for review. Please confirm that the entries in Table 7-1 for “Cultural Awareness” and “Indigenous Awareness” are not duplicates. Please provide confirmation that all employees and contractors complete the mandatory cultural awareness training (7.1.1).

B2Gold Response

- B2Gold Nunavut continues to develop its 'video-based' cultural awareness training. As has already been committed to KIA, this video will be shared with KIA once it is complete for review and comment. Most recently, B2Gold Nunavut updated its PowerPoint-based Cultural Awareness Training and shared that information with KIA for review and comment before use. B2Gold Nunavut can confirm the entries in Table 7-1 for 'Cultural Awareness' and 'Indigenous Awareness' are not duplicates; the 'Indigenous Awareness' training program listed was offered separately by one of our contractor partners. B2Gold Nunavut can also confirm it conducts mandatory cultural awareness training for all long-term employees and contractors.

7.56 KIA #58 (TC77)

KIA Comment & Request/Recommendation

- The 2025 report shows that the number of GN medivac events has increased significantly compared to previous years. The report does not identify reasons for this increase, information on the events, or describe programs or actions that B2Gold Nunavut employs or will improve to mitigate health and safety incidents on-site (e.g., description of updated medical services on-site, mandatory employee safety training, worker safety enhancements, drug and alcohol policies and mental health support programs and counselling).
- Request: Please identify the reasons for the increase in medivac and incidents in 2025 and what programs B2Gold Nunavut is developing to mitigate this increase (e.g., expanded medical services on-site, mandatory employee safety training, drug and alcohol policies and mental health support programs and counselling).
Please provide information on the medivac events themselves as well as the additional 211 health care emergencies in 2025 such as type of emergency, ratio of occupational vs non-occupational incidents, and number of Inuit workers who experienced incidents.
Please describe how B2Gold Nunavut programs and policies, including the Kitikmeot Social Investment Program may help improve health and well-being outcomes for Inuit employees.

B2Gold Response

- While there was an increase in medivac events in 2025, this correlates directly with a significant change in the Mine's operational scale. In 2025, full scale construction at the Goose Mine transitioned into ramp-up and early operations. This resulted in a substantial change in the makeup of the Mine workforce, site activity, and overall exposure hours, which contributed to a higher number of both incidents and medical responses compared to previous years. In addition, B2Gold Nunavut's surveillance and reporting on safety-related matters increased in 2025 commensurate with the Mine's operational scale.

The medivac events recorded include both occupational and non-occupational cases. These ranged from workplace injuries to personal medical conditions, including acute illnesses and mental health-related concerns. Similarly, the 211 reported health care events reflect a combination of work-related and non-work-related medical needs typical of a remote camp environment supporting a growing workforce. It is also important to note that during 2025, our on-site medical services were more limited in scope, with care primarily provided by Advanced Care Paramedics. As a result, certain cases required precautionary medivac that may otherwise have been treated on site with a broader scope of practice. In 2026, this has been addressed through the addition of Physician Assistants, significantly enhancing diagnostic capability and treatment options on site, and reducing the likelihood of unnecessary medivacs. To mitigate risks and improve outcomes, several initiatives have been implemented or are in progress.

These include enhanced health promotion and awareness through regular on-site communications, including monthly health and safety topics displayed across camp. We are also reviewing and strengthening our pre-employment medical screening process to better assess fitness for remote work, identify underlying health conditions earlier, and ensure

appropriate support is in place. In addition, the site continues to reinforce core safety programs, including mandatory safety training, drug and alcohol policies, and mental health awareness and support. Access to mental health resources, including counselling, is available to all workers, recognizing the unique challenges associated with remote work environments. With respect to Inuit employment, we continue to work collaboratively through programs such as the Kitikmeot Social Investment Program (KSI) which can support the health, safety, and overall well-being of Inuit employees. These efforts may be focused on improving access to resources, promoting culturally appropriate support, and fostering a safer and healthier work environment for all, both on- and off-site. The KSI program includes several priority funding area streams including, Education and Training, Community Wellness, and Inuit Small Business Development, which may be applicable to this topic.

7.57 KIA #14 (TC80)

KIA Comment & Request/Recommendation

- According to Section 2.3, mitigation and management for disruption of caribou and other wildlife movement focuses on the winter ice road (WIR; Page 2-6). Traffic levels on the WIR were predicted in the FEIS as an average of 40 one-way trucks per day during operation, and “between two to three trucks passing any one point of winter road per hour (h) during operation.” Methods for monitoring traffic on the WIR are stated as follows: “Total volumes of traffic are recorded by onsite personnel for each load (freight and fuel) transiting the WIR and are recorded as the number of heavy vehicles dispatched from the MLA each day. As a result, number of loads is given as return trips. Operational days is the total number of days between the opening and closure of the WIR in 2025. The number of days with loads is representative of the number of days where loads were dispatched from MLA.”

Results show that the WIR operated for 60 days in 2025, with loads being sent on 55 of those operational days (Section 2.3.3.1, Page 2-8). According to Section 2.3.3.1, there were 7,330 one-way trips on the WIR during its 60 days of operation in 2025, excluding eleven trips supporting construction of the ice road (Page 2-9). The WIR is operational 24 hours a day, except for days when weather affected traffic. Assuming constant traffic over the 55 days of operation when loads were sent, the average (mean) traffic level of the winter ice road as expressed in vehicles per hour is calculated as follows: $7,330 \text{ trips} / (55 \text{ days} * 24 \text{ hours}) = 5.55 \text{ vehicles per hour}$. We acknowledge that the assumption of a constant traffic level is unsupported, but the authors make such an assumption in their calculations. There are a few unorthodox statements and calculations in Section 2.3.3.1 that unnecessarily complicate the reporting of traffic levels on the WIR. The first unusual assumption is based on the dates when caribou were observed near the ice road, which in 2025 were April 4-17. The authors then use this window to state that this time period is “the time of year when caribou may interact with the WIR,” and subsequent calculations / estimations focus on April. During the 18 days of April that the WIR operated in 2025, the authors state there were 2,594 trips on the WIR. Consequently, the authors apparently use 2,594, or the number of “loads” or “trips” reported as occurring in April 2025, in subsequent statements and calculations of traffic level. The next assumption is that during April, “an average of 72 heavy vehicles per day used the WIR.” It is unclear where the value of 72 came from, as the calculation methods are not clearly outlined in the text, and the previously stated 2,594 trips divided by 18 days equals 144.1 trips per day. We can only assume that the “average of 72 trips per day” as stated in the text was estimated by dividing 2,594 one-way trips by

two, which results in 1,297 round trips. This number of roundtrips may have then been used to calculate the number of round trips or vehicles per day, as $1,297 \text{ roundtrips} / 18 \text{ days} = 71.9 \text{ roundtrips per day}$. If our assumptions are correct, the calculation suggested by the authors would possibly equal the number of unique vehicles per day, if each vehicle were restricted from making multiple trips. Using the number of roundtrips or unique vehicles per day to estimate traffic level ignores the fact that any vehicle that passes a point counts towards traffic level, regardless of if the same vehicle passed by the same point before. We are unaware of any reason the number of roundtrips or unique vehicles per day would differentially affect wildlife and be used in analysis instead of actual trips or vehicles. A caribou response to a vehicle is not dependent on if that vehicle was previously in the vicinity. The final unusual estimation is using the estimated number of unique vehicles or round trips per day to improperly reduce to an hourly traffic rate, which the authors state is 3 vehicles per hour. We assume this value was calculated by dividing 72 by 24. But, since 72 is an incorrect calculation of daily traffic volume in April 2025, the estimated hourly rate of traffic during 1-18 April 2025, assuming constant traffic and loads were sent on all 18 days is: $2,594 \text{ trips} / (18 \text{ days} * 24 \text{ hours}) = 6.0 \text{ vehicles per hour}$. Calculations above and in Section 2.3.3.1 apparently includes only heavy vehicles and ignore smaller vehicles that may use the WIR. Section 3.3 (page 3-3) states "A total of 3,665 loads (return trips) were hauled on the WIR during the operating period, with additional daily ancillary maintenance equipment and caribou monitoring vehicles also using the WIR." Smaller vehicles should also be included in calculating traffic levels; it is unclear why smaller vehicles were excluded or if data regarding WIR use by non "heavy vehicles" is being collected. In addition, traffic was not constant across time of day, and finer-scale analyses are necessary to understand variation in traffic. A more realistic and reliable method to calculate traffic level would be to calculate the number of vehicles per hour for each day of operation, then to average across the operational days to get an average traffic level in vehicles per hour. This method is more comprehensive and accounts for variation in traffic between days. Other such "flow rate" or "traffic intensity" estimation methods are well established and widely available. The authors cited and compared their results to a paper that modelled, among other variables, the effect of traffic volume and timing on a winter ice road (the Tibbitt to Contwoyto winter road, Northwest Territories and Nunavut) on barren-ground caribou road crossing events (Smith and Johnson, 2023). The authors state, "More recent studies suggest that the relative probability of crossing the road declines at a lower traffic rate of approximately 12.5 vehicles/h (Smith and Johnson 2023)." This sentence either contains a typo, references the wrong source, or is a misunderstanding of the paper's findings. Smith and Johnson (2023) found an inverse relationship between traffic levels and the relative probability of crossing the road; in other words, relative probability of crossing decreased as traffic level increased. Furthermore, Smith and Johnson (2023) do not recommend or report a threshold traffic level, and the figures provided in the paper are not conducive to extrapolating a threshold number from the information given. As a result, it is unclear where the value of 12.5 vehicles per hour came from. The purpose of calculating the traffic level on the WIR appears to be to compare actual WIR traffic to a "threshold of disturbance," which is not defined within the text. However, during Operations, the FEIS predicted an estimated 40 one-way trucks per day, an average of 2-3 trucks "passing any one point of winter road per hour," and an estimated 1,900 one-way trips per year (Pages 2-7, 2-9). Since there were 7,330 one-way trips in 2025 – more than three times the estimate of 1,900 – it is likely that all traffic related estimates in the FEIS were underestimates. The text does not explain why there were so many additional trips compared to the estimate,

nor any additional mitigations warranted by the traffic increase. Finally, the bottom row of Table 2.3-1 is labelled “Total” in its leftmost cell (Page 2-9). Three of the values in this row are not totals and appear to be averages (Loads per Day for both Fuel Loads and Freight Loads, and Total Loads per Day). Averages and sums should not both be in a “Total” row, as they are presenting different information. It is also not clear if the “Loads” indicated in the table are equivalent to a count of one-way trips.

- Request: The KIA requests the following:
 - Please use more established and reliable traffic level calculation methods to give the reader an understanding of the actual traffic level and the variation in traffic by day. If the authors stand by their calculations as presented in the text, more detail, justification, and explanation of the calculations must be included to fully assess the methods.
 - Please include smaller vehicles in the estimation of traffic levels. Please explain the source of the value of 12.5 vehicles per day.
 - Please provide an explanation of why the actual traffic level in 2025 far exceeded the projected traffic level in the FEIS, if the increase in traffic is expected to continue, and when the traffic level should equalize at or near the projection.
 - Please ensure that rows and columns of tables show the information as indicated by the row names and column headers. Tables should also include notes if additional information is necessary to correctly interpret the table.

B2Gold Response

B2Gold Nunavut acknowledges KIA’s comments and recommendations regarding traffic along the Winter Ice Road (WIR) and provides the following clarifications regarding its commitments and reporting related to traffic monitoring and mitigation.

- Section 7.3.1.8 of the Wildlife Management and Monitoring Plan (WMMP) describes traffic monitoring requirements for the WIR. The objective of this monitoring is to record the number of Mine vehicles using the road. As outlined in the WMMP, both total traffic volumes and average traffic frequencies are reported annually in the WMMP Report, and these metrics have been presented accordingly. With respect to caribou, potential effects related to traffic disturbance were assessed in the Final Environmental Impact Statement (FEIS) and determined to be non-residual. Nevertheless, traffic monitoring continues as a precautionary measure to support the assessment of potential interactions with caribou. Given that traffic-related disturbance is only relevant when caribou are present in the area, traffic volumes during April—when interactions are most likely—were reviewed in greater detail. During this period, an average of 72 trucks per day used the WIR. Each truck completes a round trip between the Marine Laydown Area (MLA) and Goose Mine within a 24-hour period. B2Gold Nunavut appreciates KIA identifying potential confusion regarding the distinction between vehicle counts and trip counts. Reporting methods and terminology will be clarified in future WMMP reports. Regardless of whether traffic is expressed as approximately 3 vehicles per hour or 6 one-way trips per hour, traffic levels remain well below the threshold of 20 vehicles per hour from the Smith and Cameron 1985 paper used in the FEIS.

B2Gold Nunavut also acknowledges KIA’s comments regarding the inclusion of smaller vehicles in traffic estimates. During WIR construction, vehicles are staged at multiple locations, including

the MLA, MLA Forward Camp, and Goose Main Camp, to facilitate safe and efficient road construction and operation. Passenger vehicles are not included in traffic counts because they are used primarily to mobilize personnel supporting construction and maintenance activities rather than to transport cargo. The FEIS identified a traffic rate of 20 vehicles per hour as the threshold at which reduced caribou crossing rates may occur, based on the available literature (Smith and Cameron 1985). Project traffic along the WIR was predicted to remain below this threshold, and therefore the effect was assessed as non-residual. Recognizing its commitment to minimizing potential effects on caribou, B2Gold Nunavut adopted a more conservative traffic threshold for compliance reporting by extrapolating an approximate value of 12.5 vehicles per hour from Figure 4 of Smith and Johnson (2023). B2Gold Nunavut acknowledges that this value represents an extrapolation and will provide additional clarification regarding its derivation in future WMMP reports. Regardless, observed traffic volumes along the Goose Project WIR remain below both the conservative threshold of 12.5 vehicles per hour and the FEIS threshold of 20 vehicles per hour. With respect to increased traffic levels in 2025 relative to FEIS predictions, the higher traffic volumes were associated with the final stages of mine construction and the need to maintain the project schedule. Additional transportation requirements were also associated with the commissioning of the fifth above-ground diesel storage tank and the delivery of approximately 85 million litres of diesel to the site. While traffic volumes exceeded initial FEIS predictions during this period, the adaptive management framework outlined in the WMMP states: “Should the recorded traffic levels exceed those used in the FEIS in each of three consecutive years, and if deemed required by the NIRB, then B2Gold Nunavut will conduct an assessment of road effects on caribou and submit this report to the NIRB.” Traffic volumes are expected to decline in 2026 as the project transitions to operations. The FEIS predicted traffic volumes of approximately 40 one-way truck trips per day during the operation phase of the project. B2Gold Nunavut recognizes that terminology in the reference figure and table may be confusing. Future WMMP reports will revise the label to “Cumulative,” or use another appropriate term to improve clarity and consistency in reporting.

7.58 KIA #21 (TC80)

KIA Comment & Request/Recommendation

- Section 3.3 presents the results of caribou monitoring activities regarding the winter ice road (WIR). Section 3.3.1.1 states that a team of a biologist and an Inuit land user surveyed the WIR directly, weather permitting, every day from 29-March to 18-April, 2025. It is not clear from this section if the surveys were from pre-designated locations or from opportunistic sightings of caribou while driving on the WIR, as described in Section 3.3.2.3 (Page 3-11). It is also not clear whether “Caribou Surveys on the WIR,” as described in Section 3.3.1.1 (Methods, Page 3-4) and 3.3.2.1 (Results and Discussion, Pages 3-5 to 3-7), are in addition to or distinct from surveys for “WIR Traffic,” as described in Section 3.3.2.3 (Results and Discussion, Page 3-11). The Methods section for “WIR Traffic” (Page 3-5) refers the reader to “See Section 2.3.3.1 for WIR traffic details in 2025” with no further information provided. Furthermore, it is not clear if “Caribou Surveys on the WIR” are included in or distinct from “Caribou Behaviour Monitoring,” as described in Section 3.5 (Pages 3-15 to 3-20), which also occurred at sites on the WIR in addition to sites at Goose Mine (Page 3-16).

In Section 3.3.2.1, the authors describe groups of caribou observed on 29 occasions and caribou tracks indicating nine road crossing events and conclude, “Caribou monitoring, as

well as mitigation measures along the WIR to facilitate caribou crossing, was effective. Therefore, no additional mitigation was required in 2025” (Pages 3-5 and 3-6). Appendix F, Winter Ice Road Caribou Observations, includes a table of the 29 caribou observations, indicating that 2 of the 29 detected groups (6.9 %) were observed crossing the road. Track observations are not reported in Appendix F. Based on Appendix F, it is not clear what “effective” means in reference to caribou monitoring or mitigation measures to facilitate crossings. Is the implication that monitoring was effective because caribou were detected? How does observation of two crossings indicate that mitigation was effective? Without knowing the baseline condition of how many crossings would have occurred if the road was not constructed, conjecture about mitigation effectiveness is not supported. There is a typo in Section 3.3.2.1: “Caribou behaviour surveys were also conducted along the WIR and are summarized in Section 3.6.” appears on Page 3-5; this sentence should reference Section 3.5 (Section 3.6 is Onsite Camera Monitoring).

Section 3.3.2.2, structured by headings as results for WIR Remote Cameras (Page 3-7), is confusing due to the inclusion of results from Caribou Surveys on the WIR. Specifically, the paragraph, “As there was only one caribou detection event in 2025, the detection peak occurred on the same day, April 11. The earliest caribou detection reported by WIR caribou monitors was on March 30 and the last was on April 17, with peak detections occurring between April 15 to 17.” These sentences introduce two dates or date ranges for peak detections. If the authors wish to compare or combine results from multiple aspects of the monitoring program, the incorporation should be included under a section indicating results from multiple programs to ensure clarity. It is also likely, but unstated, that the peak in detections from WIR monitoring is due to the end of WIR operations on April 18. This information should be included so that the reader completely understands the context and limitations of the determination of a peak in detections.

Section 3.3.2.2 also includes the statement, “Deployment of wildlife cameras along the WIR was effective at monitoring caribou presence near the WIR, including observing one instance of caribou crossing the WIR” (Page 3-9). Due to the single detection of caribou at a single camera site during the monitoring period, and the documentation that the monitoring period and number of detections in 2025 were lower than in previous years, it is not clear what “effective” means in this context. If possible, the observations of road crossings could be compared to or supported with collar locations from the same period to have a more complete analysis of the effectiveness of monitoring the WIR, especially in years when there are few direct observations. Also in Section 3.3.2.2, the authors state, “There were fewer detections in 2025 than previous years because the WIR closed approximately two weeks earlier than in previous years and therefore, the number of active camera days was lower” (Page 3-9). The KIA was very pleased that the WIR was able to close earlier and agreed that this would likely decrease risk to caribou. However, this statement is assigning a cause to the result of fewer detections without any type of analysis or considerations of alternative yet possible explanations for fewer detections in 2025. While the WIR operated for a relatively shorter time in 2025 compared to previous years, the traffic level on the WIR was over three times higher in 2025 than predicted by the FEIS. According to Section 2.3.1 (Page 2-7), traffic levels on the WIR were predicted to be an average of 40 one-way trucks per day during operations, with between two to three trucks per hour passing any point of the WIR. In addition, Section 2.3.3.1 (Pages 2-8 and 2-9) reports that the predicted estimate was for 1,900 one-way trips per year, but there were

7,330 one-way trips in 2025 – more than three times the estimate. There is no discussion of how traffic levels in 2025 compared to previous years, which might help make the case that the decrease in detections is due to the earlier closure rather than greater numbers of vehicles. The authors should refrain from speculating a cause for the fewer caribou detections in 2025 until an analysis of variation in traffic levels between years and other potential variables are explored.

Section 3.3.2.3 outlines the results of the observations and work of the caribou monitors travelling the WIR in 2025. As stated previously, it is not clear if this monitoring effort is distinct from “Caribou Surveys on the WIR,” as described in Section 3.3.1.1 (Methods, Page 3-4) and 3.3.2.1 (Results and Discussion, Pages 3-5 to 3-7). Nevertheless, Section 3.3.2.2 states, “Monitors observed excellent compliance with the mitigation measures, and multiple groups of caribou successfully crossing the WIR during pauses in traffic.” There is no indication of if these observations of caribou road crossings are distinct from those reported in Section 3.3.2.1 or Appendix F or reported elsewhere in the report.

Request: The KIA requests the following:

- Please provide clear descriptions of different monitoring efforts, if they are different, and ensure that results from monitoring efforts are shared in distinct sections. Different types of monitoring can be discussed together and / or compared to each other as long as the descriptions are clear and in properly labelled joint results sections.
- Ensure that all section references are accurate.
- While the KIA is pleased that the WIR was able to close 2 weeks earlier in 2025 compared to 2024, please refrain from overstating results and assigning cause-and-effect without appropriate analyses and consideration of feasible alternative explanations. Please acknowledge limitations in cases of conjecture or discussion of hypotheticals.
- Consider an analysis comparing road crossing observations with collar locations from the same period to have a more complete understanding of the effectiveness of WIR monitoring, especially in years when there are few direct observations.
- Please include a discussion of projected versus actual traffic levels on the WIR and how that may affect caribou road crossings. Please ensure that results of all monitoring efforts are included in the annual report and accurately labelled and cross-referenced to support statements within the text.

B2Gold Response

- B2Gold Nunavut will consider incorporating KIA’s comments regarding section layout in future WMMP Reports and will make sure section references are accurate. As outlined in the WMMP, caribou monitoring along the Winter Ice Road (WIR) is triggered when the WIR remains operational after April 15, reflecting the period when caribou are more likely to occur in the vicinity of the road during spring migration. During a CTAG meeting, B2Gold Nunavut committed to implementing monitoring beyond WMMP requirements by initiating surveys at the end of March to account for the potential presence of early spring migrants. As the WIR closed on April 18, monitoring occurred for a relatively limited period during the time of year when caribou distribution is expected to overlap with the WIR.

8. TC (NIRB DOC. ID# 361826)

B2Gold Nunavut acknowledges comments from Transport Canada and has provided the requested information in the following sections.

8.1 TC #05 (TC14)

TC Comment & Request/Recommendation

- 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.
- 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.

B2Gold Response

- B2Gold Nunavut acknowledges TC's comment and understands that there are no responses required at this time.

8.2 TC #06 (TC14)

TC Comment & Request/Recommendation

- 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.
- 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.
- Request:
 1. B2Gold must 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 *nil* 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.

B2Gold Response

- B2Gold Nunavut acknowledges TC's comment and will register in TC's Client Identification Database as per Section 17.3 TDG Regulations. Manifests from 2025 are included in Appendix TC-06 (TC14). B2Gold Nunavut will also include manifest regarding transportation of dangerous goods and hazardous materials in future Annual Reports.

8.3 TC #01 (TC89)

TC Comment & Request/Recommendation

- Oil handling facility in compliance with Canada Shipping Act 2001 Part 8. Marine Transportation Security Regulations met; certificate current and valid. No TC inspection or enforcement at OHF or marine facility in 2025.

B2Gold Response

- B2Gold Nunavut acknowledges TC's comment and understands that there are no responses required at this time.

8.4 TC #02 (TC90)

TC Comment & Request/Recommendation

- OPEP (Version 05-31-2025) submitted to TC Marine Safety Environmental Response Program. OHF operators must submit OPEP/OPEP annually; a change in operations triggers 90-day advance submission. Changes to oil loading/unloading require 180-day advance notice to TC.

B2Gold Response

- B2Gold Nunavut submitted to Transport Canada on June 22, 2026 its annual compliance report for the Allen Kpolak Marine Laydown Area (AKMLA) Oil Handling Facility - Oil Pollution Prevention Plan and Oil Pollution Emergency Plan (OPEP/OPPP).

8.5 TC #03 (TC91)

TC Comment & Request/Recommendation

- TC recommends Proponent ensure vessel operators are aware of the 2026 Annual Notice to Mariners: section A2 (Marine Mammal Guidelines and MPAs); section 7A (Voyage Planning for Northern Waters); section 7C (Kitikmeot Region Waters).
- Request: bring to B2Gold's attention.

B2Gold Response

- B2Gold Nunavut acknowledges TC's comment and understands that there are no responses required at this time. The 2026 Annual Notice to Mariners including section A2 (Marine Mammal Guidelines and MPAs); section 7A (Voyage Planning for Northern Waters); and section 7C (Kitikmeot Region Waters) was downloaded and shared with the Allen Kpolak Marine Laydown Area (AKMLA) Oil Handling Facility personnels.

8.6 TC #04 (TC91)

TC Comment & Request/Recommendation

- TC NPP holds three MLA approvals (2012-600767-002; -003; -006). No NPP complaints or inspections in 2025. Transfer of Ownership from Sabina to B2Gold completed April 2026.

B2Gold Response

- B2Gold Nunavut acknowledges TC's comment and understands that there are no responses required at this time.

9. REFERENCES

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