



Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
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July 14th, 2025

Re: Review of B2Gold Nunavut 2024 Annual report for Back River Project.

Dear Richard Dwyer, the KIA has reviewed B2Gold Nunavut's 2024 Annual Report for the Back River project to the NWB.

Gjoa Haven
Okhoktok

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with B2Gold Nunavut that cover terms and conditions of NIRB Project Certificate 007 and the NWB Type A water license.

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

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by B2Gold Nunavut to the KIA, which is summarized as follows:

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

This annual report is to provide information on:

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



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- Drilling programs, methods, locations, spills of fluids or muds and the amount of water discharge.
- Water use and effects on water.
- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

B2Gold Nunavut has provided the KIA with the **Back River Project 2024 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Back River 2024 Annual Report to the NWB**.

Compliance Status

2) Effects of Monitoring:

a) Whether the conclusions reached by B2Gold Nunavut in the Back River 2024 Annual Report to the NWB are Valid.

KIA's consultants in the areas of wildlife, aquatic sciences, and geotechnical engineering reviewed the Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831 and the following documents:

- Appendix A – Winter Ice Road Water Use.
- Appendix B – Waste Disposal.
- Appendix C – Monitoring Program Activity Overview by Station.
- Appendix D – Water Quality Analytical Results.
- Appendix E – 2024 Baseline Surface Water Quality Report.
- Appendix F – Geochemical Monitoring Results.
- Appendix G – Landfill and Waste Management Plan.
- Appendix H – Engagement Record.
- Appendix I – Reportable Spills Record.
- Goose & MLA Project Sites – 2024 Annual Geotechnical Inspection.



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In 2024, B2Gold Nunavut continued construction activities at the site that focused on building the mine site. These being ongoing construction of the plant site, mill, and truck shop. Completion of Phase 2 of the accommodations complex expanding the camp to 600 beds. Construction of the primary pond, completion of Echo Pit pre-stripping and the commencement of mining.

Overall, our consultants find B2Gold Nunavut's conclusions in the 2024 Annual Report to the NWB are valid. B2Gold Nunavut has presented adequate information to demonstrate that the Back River Project has complied with the conditions of its Type A water license.

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

Back River Project 2024 Annual Report to NWB

KIA-NWB-01

Review Comment Number	KIA-NWB-01
Subject/Topic	Waste Disposal
References	Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831 (March 2025) <ul style="list-style-type: none"> Appendix B- Waste Disposal- Table B-1 through B-7
Summary	Section 9 (Summary report of all general waste disposal) of the 2024 annual report summarizes the tables of waste disposal provided in Appendix B. Information on oversights and instances where data were not tracked (for backhauled wastes, wastes incinerated, open burned, and waste oil for heating, loads to landfill sites, and estimated groundwater greywater discharge) were also noted.
Detailed Review Comment	Table B-1 – WWR is listed as a description for waste backhauled on May 15, 2024. This should not be abbreviated for clarity on the material backhauled. Table B-1 – There are several instances where the description is the same for both dangerous and non-dangerous goods hauled. Provide more detail in the description to clarify the distinction. For instance, on March 1, 2024, waste oil is classified as non-dangerous but on April 12 and 15, 2025, waste oil is classified as dangerous. Is this a typo? A similar discrepancy is also seen in the case of contaminated soil and used hydraulic oil filters. Table B-7 Please indicate what “-“ means in the table. Is this zero?



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Recommendation/ Request	<ul style="list-style-type: none"> It is recommended that more detailed descriptions are included in Tables B-1 and B-2 to clarify the difference between dangerous goods and non-dangerous goods where the descriptions are similar Recommend stressing the importance of record keeping reducing the amount of missing data and the need for estimating in the waste management summary tables. There are several discrepancies noted (same substances listed as dangerous versus non-dangerous goods), abbreviations used, and clarifications needed, as noted in the detailed review comment.
Importance	Low

KIA-NWB-02

Review Comment Number	KIA-NWB-02
Subject/Topic	Landfill and Waste Management Plan
References	<p>Back River Project, 2024 Annual Report for Water Licence 2AM-BRP 1831 (March 2025)</p> <ul style="list-style-type: none"> Appendix G- Landfill and Waste Management Plan V.4.0
Summary	The Landfill and Waste Management Plan has fulfilled project requirements, but it could be improved to provide more clarity and to remove potential causes of misunderstanding to future users of the plan. Some rearranging of information may also be helpful for avoiding redundancy and for readability.
Detailed Review Comment	<p>Section 2. Scope and Objectives- Under the first set of bullets, it states that “B2Gold Nunavut’s management of various waste streams (i.e., waste rock, liquid wastes, and incinerated wastes) are discussed and addressed in greater detail under other plans.” Perhaps add: “These plans are listed in Section 2.1 below” if the other plans mentioned are all included in that section. Otherwise, add references to any missing plans.</p> <p>Section 4. Planning and Implementation- Some revision of the text in this section would make the section flow better so that the order of discussion is as follows: B2Gold Nunavut’s policy on waste reduction, pollution prevention (with Figure 2), waste segregation, proactive procurement policy, strategic material substitution, strategic chemical substitution, and chemical approval process.</p> <p>Consider starting the section with the first two paragraphs under Figure 2. Move the third paragraph under Figure 2 to come prior to the</p>



	<p>“Proactive Procurement Policy” section.</p> <p>Move the “Pollution Prevention” section and Figure 2 to after the first two paragraphs and move the “Waste Segregation” to come after the “Pollution Prevention” section.</p> <p>Move the following sentence at the end of the “Chemical Approval Process” section to the beginning of the “Waste Segregation” section: “Segregation of waste at its source is the goal to maintain B2Gold Nunavut’s environmental stewardship and waste reduction initiatives:”</p> <p>Section 5.2 Environment- The first sentence of this section implies there are weekly inspections, but the last sentence says inspections of waste bins will be made “as frequently as possible”. It would be good to have a clear indication of the frequency of inspections and locations of inspections if waste is stored in different places prior to being sent to the landfill (e.g., daily inspection of waste bins and weekly inspections of materials at the landfill).</p> <p>Section 5.3 Tech Services– Clarify the types of figures to be generated in the following sentence: “This will be validated by completing weekly or monthly surveys, as required, and generating figures.”</p> <p>Section 5.4 Site Services- change “are” to “is” in the first sentence.</p> <p>Section 6. Landfill and Waste Management Infrastructure – This section begins with a discussion of waste management procedures. I would move the procedures text to a Section 7 where procedures are discussed and specifically discuss the infrastructure in this section.</p> <p>Consider including the reference for each of the bulleted waste management procedures in parentheses. For example, Open burning of untreated wood and carboard (LWMP), incineration of non-hazardous combustible wastes (IMP), etc., and refer to Section 2.1. Should landfarm be included as one of these waste management bullets? Perhaps add the location of the waste management sites clearly to the map, as shown for the potential landfill locations (incinerator, landfarm etc.).</p> <p>Define low wind strength in the following sentence “Open burning of permissible items in temporary quarries will only be done when wind strengths are low to prevent the unintentional scattering and deposition of wind-blown debris into nearby waterbodies (i.e., Goose Lake).” Is there a threshold wind speed for allowing burning?</p>
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	<p>Define “regular inspections” in the following sentence “Regular inspections will also be conducted to document the condition of the quarry and landfill(s) to determine if it warrants a clean up to prevent windblown debris from escaping containment.” Are inspections daily, weekly?</p> <p>Section 6.1.1 Landfill Location – Refer to map where waste rock storage areas are potential landfill locations.</p> <p>Section 6.1.2 Landfill Design Considerations – In the second paragraph, the following sentence needs to have a figure connected to the reference: “Figure XX shows the method for construction of landfill cells.” It should refer to Figure 3 in Section 7.3.</p> <p>The design considerations here assume that the landfill will freeze into the permafrost. Has there been consideration of potential for future permafrost thawing due to climate change in the design considerations and potential effects of the landfill if thaw occurs?</p> <p>Section 6.2 Temporary Waste Storage Facilities – The first sentence is a smaller font size than the rest of the document.</p> <p>“Sewage sludge waste” needs a bullet.</p> <p>Section 6.3 Open Burning – The section says that the open burn area is “located in the temporary quarry”. It would be helpful to have the temporary quarry labelled in the Goose Lake Map on p. 12.</p> <p>Section 7. Waste Management – The first sentence of the second paragraph “waste produces” should be “waste products”.</p> <p>Section 7.1 Overview of Waste Types - Delete the following sentence in the second paragraph as it is repeated from Section 7: “The management of each classification of waste at the Goose Property and the MLA considers the type of waste produces, waste storage, waste handling, waste separation/segregation and final destination”</p> <p>Sections 7.1.1 Recyclable Waste, 7.1.2 Landfill Waste and 7.1.3 Open Burn Waste – The information in these sections could be incorporated into the relevant numbered items in Section 7.1.</p> <p>Section 7.2 Overview of Waste Handling and Segregation – This section could benefit from a flow chart or table that identifies the</p>
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	<p>locations for waste generation, how waste is managed at each site, and who is responsible for inspections and at what frequency. For instance, the main camp generates paper/carboard waste that is stored in bins that will go to the open burn area, then ash to the landfill with inspections of waste containment at the camp by X at X times, at the burn site by X at X times, and at the landfill by X at X times.</p> <p>In what form will the tracking be recorded or evaluated in the following sentence in the third paragraph of this section: "Volumes of waste and recycling materials collected at each collection station or waste management area and delivery to its end disposal location will be tracked."? Perhaps also add the responsible party or refer to the section on roles and responsibilities (Section 5).</p> <p>Section 7.2.1 Waste Generation Areas – The second set of bullets could be eliminated and the type of non-mineral solid wastes listed in Section 7.1 could be referenced. The footnote defining mineral waste could also be moved up to Section 7.1.</p> <p>I would perhaps add the types of waste expected to be generated at each of the areas to the first set of bullet points and eliminate Sections 7.2.2 and 7.2.3 or make a table of this information that includes areas expected to generate waste in rows with types of waste expected, where to dispose of waste in each area temporarily, frequency of inspection, and any special considerations in columns.</p> <p>Section 7.2.4 Waste Management Areas – This information could be incorporated into Section 7.2.</p> <p>Section 7.2.5 Medical and Biohazardous Waste – This is the first mention of biohazardous waste and should probably be listed in the numbered items in Section 7.1 along with the information on handling of biomedical waste. This section could then be removed.</p> <p>Section 7.2.6 Wind Turbine Disposal – The discussion of the wind turbine disposal could be added at the end of Section 7.2 as a special consideration and likely does not require a stand-alone section.</p> <p>Section 7.3.1 Permafrost Management – As stated in the comment for Section 6.1.2, please indicate whether there have been management considerations that account for potential for permafrost thaw due to climate change and if so, state where that has been addressed.</p> <p>Section 7.3.2 Leachate Management - <i>"Because the landfill will be in an area covered by permafrost, deep groundwater contamination from</i></p>
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	<p><i>landfill potential leachate is not anticipated.</i>” This does not consider potential for thaw due to climate change. Is this considered in another management plan?</p> <p>Section 7.3.4 Acceptable Landfill Waste, and Section 7.3.5 Unacceptable Landfill Waste – I would move the tables in this section into a section after 7.1 and put it in a Heading 2 section (Section 7.2) titled Landfill Waste Materials (or similar), then add the table with Acceptable landfill wastes (Table 7-1), Unacceptable landfill wastes unless approved (made into a table for consistency), and Table 7-2 Prohibited landfill wastes, in this section.</p> <p>Section 7.3.6 Waste Asbestos, Section 7.3.6.1 Fluorescent Lamp Tubes, and Section 7.3.6.2 Ozone Depleting Substances – I would add these sections as a special considerations subheading under the Heading 2 section that is recommended in the above comment. Also add fluorescent lamp tubes and ozone depleting substances to the Prohibited landfill items table.</p> <p>Section 7.3.6.3 Maintenance – The information in this section should be incorporated into Section 7.3.</p> <p>Section 8. Environmental Protection Measures and Monitoring Program – Add who is responsible for record keeping at waste sites and be more specific about when material tracking logs are reviewed. A regularly required review might decrease the frequency of missing data for the records.</p> <p>Add inspection of landfill cells for signs of run-off to the first set of bullet points in this section.</p> <p>Add “Reviewing records of” to the bullet for “Quantity and type of materials deposited in the landfill”.</p> <p>Add “and appropriately mark” to the bullet: “Record of location of asbestos waste disposed of in the landfill, as required.”</p>
Recommendation/Request	<p>The KIA recommends the following:</p> <ul style="list-style-type: none"> • Restructuring of some of the text in the document as per the detailed review comments above to eliminate redundancy and increase clarity. • Add a table or flow chart to track waste management from areas of waste generation to the landfill or other appropriate sites, indicating the responsible party for inspections and frequency of inspections.



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Importance	Low
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KIA-NWB-03

Review Comment Number	KIA-NWB-03
Subject/Topic	STP effluent limit for bacteria
References	Main Document – Table 2.13-6 (p.24 of PDF)
Summary	Total coliforms are compared to the effluent limit for fecal coliforms
Detailed Review Comment	<p>The effluent limit for bacteria for the Goose Property sewage treatment plant (STP) is based on fecal coliform bacteria. However, as noted below Table 2.13-6, data on total coliform bacteria are compared to this limit:</p> <p><i>“*Effluent quality limit is for fecal coliforms (CFU/100 mL), data are for total coliforms (MPN/100 mL) and are a conservative comparison to the effluent quality limit.”</i></p> <p>This is indeed conservative, as fecal coliforms are only a fraction of the total community of coliform bacteria; however, this “apples-to-oranges” comparison obscures the actual performance of the STP, as the total coliforms concentration on 2 Sep 2024 was well above the limit of 1,000 CFU/100 mL, but it is unclear whether the limit for fecal coliforms was or was not exceeded.</p>
Recommendation/Request	Fecal coliform bacteria in STP effluent should be quantified and reported for comparison to the associated effluent limit.
Importance	High

KIA-NWB-04

Review Comment Number	KIA-NWB-04
Subject/Topic	Location of monitoring station BRP-15
References	<p>Appendix C - Monitoring Program Activity Overview by Station – map on p.52 of PDF</p> <p>Appendix D - Water Quality Analytical Results – Table D-5 on p.61 of PDF</p>
Summary	Two distinct locations are associated with station code BRP-15
Detailed Review Comment	There are two distinct locations (almost 4-km apart) labelled on the map (p. 52) with the same site code (BRP-15). In Table D-5 the station code BRP-15 is associated with the descriptions “Goose Lake



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	Exploration Tank Farm” and “Goose Fuel Tank Farm”.
Recommendation/ Request	If both locations associated with BRP-15 are actively sampled they should be assigned unique station codes.
Importance	Moderate

KIA-NWB-05

Review Comment Number	KIA-NWB-05
Subject/Topic	Increased chemical concentrations in west Goose Lake adjacent to mine site
References	Appendix E – 2024 Surface Water Quality Report
Summary	Concentrations of many parameters in 2024 were elevated in the western basin of Goose Lake relative to previous years and relative to the lake’s main basin.
Detailed Review Comment	Following construction activities that have expanded the disturbed mine site area in 2024 relative to 2023 (as is evident from inspection of satellite imagery) concentrations of many parameters have increased in the western basin of Goose Lake (i.e., adjacent to the project area) and are much higher than in the rest of the lake. The increasing trends and guideline exceedances (for cyanide, nitrate, nitrite, and several metals) were noted in the report but there was no discussion of links to project activities or mitigation measures.
Recommendation/ Request	Given the magnitude of the concentration increases, number of parameters for which concentrations have increased, and the number of parameters in excess of guideline values, it is requested that links between project activities and the change in water quality in the western basin of Goose Lake be discussed (i.e., potential mechanisms be identified) and that mitigation measures be planned in case concentrations continue to increase in 2025 and to expand spatially beyond the west basin of the lake.
Importance	High

KIA-NWB-06

Review Comment Number	KIA-NWB-06
Subject/Topic	Chlorophyll-a filter type change
References	Appendix E – 2024 Surface Water Quality Report – Appendix C – p.150 of PDF



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

KIA-NWB-07

Review Comment Number	KIA-NWB-07
Subject/Topic	2024 Geochemical Testing – Sources of Applied Criteria and Results
References	B2Gold Nunavut Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831, Section 2 and Appendix F
Summary	<ul style="list-style-type: none"> • In 2024, environmental monitoring was carried out for geochemical programs at the Back River Project site. • A total of 3,010 samples of waste rock were collected and submitted for testing to determine if the rock was potentially acid-generating (PAG) or non-acid-generating (NPAG). • Results were presented in Appendix F of the Annual Report in tabular format, and PAG versus NPAG classifications were in accordance with criteria shown on page 2 of Appendix F (or page 1,311 of the document ‘2024 Annual Report for Water Licence 2AM-BRP1831.pdf’). • No metals results, such as solid-phase elemental testing nor shake flask extraction (SFE) testing, were provided.
Detailed Review Comment	<ul style="list-style-type: none"> • Appendix F provides a response to Water Licence conditions related to geochemical testing, of which one condition is defined as providing “geochemical outcomes or observations that could imply or lead to environmental impact”



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	<ul style="list-style-type: none"> Appendix F states that “Geochemical data is regularly reviewed for potential environmental impacts. No geochemical outcomes or observations that could lead to environmental impacts were identified in 2024.” No further details are provided; in particular, criteria used in the assessment of this interpretation (i.e., no environmental impacts were identified) was not provided. As metals data were also not provided, it is unclear whether this conclusion considered metal leaching (ML) potential. A similar review comment of absent SFE data to inform a ML assessment was provided in 2023.
Recommendation/ Request	<ul style="list-style-type: none"> Details related to the criteria used to conclude that “no geochemical outcomes or observations that could lead to environmental impacts were identified in 2024” are requested. Data associated with an assessment of a sample’s ML potential should also be included, along with the criteria for comparison. As also noted in 2023, results from all geochemical testing are requested to be provided as part of annual reporting.
Importance	Moderate

KIA-NWB-08

Review Comment Number	KIA-NWB-08
Subject/Topic	2024 Geochemical Testing – Sample Details
References	B2Gold Nunavut Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831, Section 2 and Appendix F
Summary	<ul style="list-style-type: none"> A total of 3,010 samples of waste rock were collected and submitted for testing in 2024, which were tabulated and provided in Appendix F of the Annual Report. Details associated with the timing and location of the 3,010 samples collected were not provided to provide an understanding of the representativeness of these data to the waste rock produced in 2024. Monthly records of NPAG versus PAG classified waste rock volumes produced and used in 2024 were not provided, which would provide an assessment of the Project’s waste rock monitoring program.
Detailed Review Comment	<ul style="list-style-type: none"> As of December 31, 2024, there has been 1,498,305 m³ of waste rock generated and used for construction 3,010 samples of potential construction material were collected at the Project site.



	<ul style="list-style-type: none"> The details provided in the Annual Report suggest a sample frequency of one sample per ~500 m³ was achieved in 2024, which aligns with the sampling guidance provided in the Waste Rock Management Plan (Sabina, April 2022) (i.e., minimum of 8 samples per 100,000 tonnes). The Waste Rock Management Plan also indicates that quantities of NPAG and PAG waste rock will be recorded on a monthly basis, as per Water Licence 2AM BRP1831 Part 1 Item 9b. These details were not provided in the 2024 Annual Report, which had also been noted in BGC's review of the 2023 Annual Report. The Waste Rock Management Plan states that samples are to be collected from blast holes drilled in the rock quarries prior to waste rock excavation, and details associated with sample depth, location and blast hole number are to be recorded. Such sample details were not provided in the 2024 Annual Report, which had also been noted in BGC's review of the 2023 Annual Report..
Recommendation/ Request	<ul style="list-style-type: none"> Additional details associated with the samples collected in 2024 are requested, which should align with the Project's Waste Rock Management Plan. Monthly records of the amount of NPAG to PAG material produced (not just totals as per Table B-7) and its use are requested to be provided, to align with the Project's Water Licence. If these records have been provided, but are located in a separate document, this reference should be cited in the Annual Report.
Importance	Low

Review Back River Project - 2024 Geotechnical Annual Report

General

SRK completed the geotechnical site inspection from September 5-10, 2024, hence most observations recorded in the 2024 AGI Report are based on the conditions encountered at that time. Additional information was provided to SRK by B2Gold Nunavut, such as drone imagery, following the in-person inspection, which was used by SRK to complement some of their initial observations. Comments were therefore based on the state encountered in September 2024. SRK also noted that if the infrastructure and earthworks construction are completed according to the available designs, significant issues are not anticipated at this stage.

KIA's geotechnical consultant, BGC, reviewed the 2024 AGI Report and its 5 appendices. In the 2024 AGI Report, SRK provided detailed observations related to the Goose Property and the MLA.



A total of 40 observations with suggestions / recommendations were reported for the Goose Property and 20 for the MLA Site, of which 14 were identified by SRK as critical or time sensitive, and some have been addressed by B2Gold Nunavut since the inspection.

KIA's consultant understands that the Back River project is still transitioning and in a pre-production ramp-up stage, and therefore many pads, roads, ponds, and water conveyance (culvert) structures were still at an interim state in 2024. However, even during that transition, protection of sensitive permafrost and proper drainage is critical, as outlined in detail by SRK in their annual report. KIA agrees with the findings presented by SRK that highlight locations where:

- thermal protection is considered insufficient; for example, as a result of thin pads or road fills;
- drainage is insufficient, resulting in enhanced permafrost degradation through ponding or thermal erosion; and
- geomembrane liner was found to be not well-anchored or insufficiently covered.

The recommended actions, which include adding fill, allowing for space between the edge of the fill and a load on a pad, anchoring of the liners, managing surface drainage, and continuation of visual and drone image monitoring are considered reasonable.

2024 AGI Recommendations

KIA's consultant agrees with the observations prepared by SRK and emphasizes the importance for B2Gold Nunavut to follow associated recommendations. The AGI Report highlights the key challenges B2Gold Nunavut encounters on site, which had been identified during previous AGIs, and provides several recommendations that KIA agrees with. The 2024 AGI report further emphasizes that many of the comments made were noted in the 2023 AGI Report as well. SRK further highlights the following:

- Most roads are partially built, with fill thicknesses ranging from 0.5 m to 1 m. Some areas are nearing design thickness, especially around the MLA Tank Farm, Echo Pit, and Goose Camp.
- Areas near surface water flow paths and infrastructure edges require closer attention and monitoring to ensure that any massive ground ice in the foundation is not being degraded.
- Heated buildings can deepen the active layer, potentially degrading ice-rich permafrost and causing settlement. Designs should account for heat transfer to the ground.



- Structures near pad edges (5–7 m) require careful monitoring. Most critical infrastructure is built on bedrock, but areas with frozen overburden in the foundation would typically be expected to need additional attention and monitoring.
- Heavy vehicle traffic should be limited to 1-3 m of shoulders during August when the active layer is the deepest.
- No notable construction in talik zones has been observed to date. Additional investigations into the thermal conditions near the future Saline Water Pond (Umwelt Dam) location are still required to confirm the presence or absence of a talik in this area.
- Tension cracking along sides of the Goose and MLA airstrips and portions of the roads and pads, continues to be noted by SRK. This cracking should be monitored and repaired/regraded if required.
- Ponding water has been reported, accumulating along the southwest end of the airstrip near the old ephemeral streams crossings. The south end of the Goose airstrip will require monitoring and more permanent long-term water conveyance through portions of the airstrip should be considered by site (dependent on length of airstrip site is targeting).
- At the MLA, there is ponding water against the southern-to-southwestern edges of the Airstrip. Pumping down / removal of any ponded water at the toes of the airstrip embankment in the fall (before winter freeze-up) would increase the cold ambient air and ground heat transfer to help slow down permafrost degradation

Requests

KIA's consultant understands that B2Gold Nunavut continues to implement and address recommendations listed in the 2024 AGI Report following its finalization in April 2025. KIA anticipates an update on how B2Gold Nunavut is addressing the observations listed in the 2024 AGI report. With respect to some of the work that has been done and reported to SRK between the date of the inspection and the reporting, KIA is requesting the following clarifications:

- *Critical / Time Sensitive Observation No. 9:* B2Gold Nunavut to provide an update on the installation of the culverts and removal of the material partially blocking flow, and if this was achieved prior to freshet.
- *Critical / Time Sensitive Observation No. 10:* B2Gold Nunavut to provide an update on the pre-freshet re-inspection and repair/clearing of all culverts.
- *Critical / Time Sensitive Observation No. 13:* B2Gold Nunavut to provide an update on the road thickness build-up.
- *All-Weather Road – Site Inspection Observations:* B2Gold Nunavut to provide a plan on how to manage snow along impacted sections of the AWR that



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- appear to be disturbed in part from the thawing of snow piles that were deposited during the previous winter seasons.
- *All-Weather Road – Site Inspection Observations:* B2Gold Nunavut to provide as-builts for the AWR.
 - *Goose Neck Crossing – Site Inspection Observations:* B2Gold Nunavut to provide an update on the construction.
 - *Gander Crossing – Site Inspection Observations:* B2Gold Nunavut to provide an update if the area was regraded and fill material placed to promote water flow toward the lake and prevent further disturbance.

Thank you.

A handwritten signature in black ink that reads "John Roesch".

John Roesch, P.Eng.

Senior Hope Bay Project Officer
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