Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
GCDocs# 139883172

August 29, 2025

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to Reply on the Review of the Licence 2024 Annual Report for the Back River Project, Type A Water Licence No. 2AM-BRP1831

Dear Richard,

Thank you for the August 25, 2025 invitation to review the referenced licence 2024 annual report reply, submitted by B2Gold Back River Corp. (B2Gold Nunavut), for Type A Water Licence No. 2AM-BRP1831.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator

Canada

Technical Review Memorandum

Date: August 29, 2025

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Response to Reply on the Review of the Licence 2024 Annual Report for the Back River Project, Type A Water Licence No. 2AM-BRP1831**

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

Table 1: Summary of Recommendations

Recommendation Number	Subject	Status
R1	Stream Water Quality – Increasing Site Water Quality Exceedances	Resolved
R2	Surface Water Quantity - Water Management Plan	Not Resolved
R3	Infrastructure & Engineering – Dams/Dikes Seepage Monitoring and Reporting	Resolved
R4	Infrastructure & Engineering – Echo and Umwelt Pit Slope Cladding	Resolved
R5	Landfill & Waste Management – General	Not Resolved
R6	Landfill & Waste Management – Incinerator Testing	Resolved with Comment
R7	Landfill & Waste Management – Waste and Waste Chemical Storage	Resolved
R8	Acid Rock Drainage & Metal Leaching – Waste rock disposal volumes	Resolved
R9	Acid Rock Drainage & Metal Leaching – Echo Pit Water Management and Monitoring	Resolved
R10	Acid Rock Drainage & Metal Leaching – Construction Waste Rock Volumes	Resolved
R11	Acid Rock Drainage & Metal Leaching – SFE Testing	Not Resolved
R12	Hazardous Materials Management – Waste Tracking System	Resolved
R13	Hazardous Materials Management – Residual Waste Impacts	Not Resolved

R14	Hazardous Materials Management – Timeline for Construction of Hazardous Waste Storage Facility	Resolved
R15	Geochemical Properties of Overburden Materials	Not Resolved

A. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
250822 2AM-BRP1831 2024 Annual Report Response to Comments-IMLE	B2Gold Back River Corp. August 22, 2025.

B. RESULTS OF REVIEW

2. Surface Water Quantity – Water Management Plan

Reference:

- 240528 2AM-BRP1831 Water Management Plan Version 5-IMLE
- 2024 Annual Report for Water Licence 2AM-BRP1831; Table 2.20-1 Plans Submitted to NWB in 2024 or as an Appendix to this Report
- File name: 240528 2AM-BRP1831 Water Management Plan Version 5 Addendum 01-IMLE
- Addendum 1 to Water Management Plan Version 4; April 2022. Addendum not dated, summarizing all changes provided in red text in Version 5 Water Management Plan, May 2024.
- File name: 240528 2AM-BRP1831 Water Management Plan Version 5-IMLE
- Back River Project Water Management Plan, May 2024

Comment:

The 2024 annual report for Water Licence 2AM-BRP1831 states that the Water Management Plan (WMP) dated May 2024 was approved by the Nunavut Water Board.

An undated addendum document provides details of the changes to the previous WMP, Version 4, dated April 2022, which are highlighted with red font in the updated WMP, Version 5, dated May 2024.

The updated WMP dated May 2024 includes a revision log:

Revision Log

Version	Date	Section	Page	Revision
0	November 2015	All	All	Supporting Document for Final Environmental Impact Statement; submitted to Nunavut Impact Review Board (NIRB).
1	October 2017	All	All	Supporting Document for Type A Water Licence Application; submitted to Nunavut Water Board (NWB).
2	June 2020	All	All	Updated to reflect the 2020 Modification Package changes, and as a Supporting Document; submitted to the Nunavut Planning Commission (NPC) and NIRB.
3	October 2020	All	All	Submitted as a Supporting Document for the Type A Water Licence Amendment Application to the NWB.
4	April 2022	All	All	Supporting Document for Type A Water Licence Amendment Application; submitted to Nunavut Water Board (NWB)
5	May 2024	Addenda 1	Addenda 1	Version 4 updated to include clarifying language supporting management of specific runoff and snowmelt water at freshet associated with Open Pits and interim water management strategy.

However, the report title (Water Management Plan, WMP) does not include a version identifier. The referenced Version 5 “Addenda 1” section that would include revision details is not included in the May 2024 WMP despite being explicitly referenced in the revision log.

The May 2024 WMP does not include any figures to show the locations or characteristics of water management features being described in the WMP. The WMP Appendix A reference to figures having been “Submitted to the NWB on April 29, 2022” is inadequate.

The May 2024 WMP Appendices include empty placeholders for Appendix B, Saline Water Management Plan, and Appendix C, Water and Load Balance Report. Appendix cover page sentences indicate that Appendix B was “Submitted ”to the NWB on April 29, 2022” and that Appendix C was “Submitted to the NWB under separate cover August 30, 2022”. These statements are inadequate to properly reference or retrieve these documents which are relevant to the current WMP.

The undated addendum to Version 4 April 2022 WMP states that Table 5.2-3 is updated in Version 5 to include construction of an emergency dump pond, but this change could not be located in the May 2024 WMP.

Construction of the emergency dump pond (Sabina 2021) is added to WMP Version 5 Section 6, together with discussion of “the Emergency Discharge Pond”, all in red font to identify modified text. It is unclear if these refer to a single facility with different names or if the emergency dump pond is separate and distinct from the emergency discharge pond. These facilities were not identified in the prior WMP and no figures are provided with the May 2024 WMP to show facility locations. Without figures, it is not possible to identify any conflicts or interactions with other proposed water management facilities. Further, the WMP does not provide a design basis for these emergency facilities or description of how they are to be used and/or managed.

Recommendation:

(R-02) CIRNAC recommends that B2Gold Nunavut re-issue the May 2024 WMP with minor modifications identified below, to provide necessary information for its implementation as a regulatory document and to establish a revised template to be used in subsequent revisions.

1. Expand the document title to include the revision number., i.e., Water Management Plan, Version 5.0, May 2024.

2. Appendix A, Figures, needs to include all figures listed in the WMP Table of Contents for Appendix A, Figures, The cover page at the front of Appendix A should be revised to identify the document(s) in which the figures were originally provided to the NWB, and confirm whether they are applicable to the current WMP.

3. The report needs to include figure(s) showing the location and extent of the proposed Emergency Dump and Emergency Pond. Presumably these would be added to Appendix A, Figures. The titles of the added figures need to also be identified in the list of figures in the WMP table of contents.

4. The cover pages at the start of the Appendix B, placeholder for the Saline Water Management Plan, and Appendix C placeholder for the Water and Load Balance Report should provide the full references to (1) the reports that were originally provided to the NWB, and (2) previous WMPs that included copies of the reports. Statements should be included to confirm whether the previous reports are applicable to the current WMP. If digital copies are available from the project registry, links should be provided.

5. Additional information about the proposed Emergency Dump and Emergency Pond needs to be included in the WMP. The 2024 WMP includes a new reference to a previous relevant report: Sabina 2021, SBR6SDE-00-C-RPT-0002-R0 Emergency Discharge Pond Design Report, submitted to the Nunavut Water Board. June 2021. A full copy of this report should be provided as an additional appendix to the 2024 WMP.

6. Appendices should be added to provide copies of: (1) the "Addenda 1" identified in the WMP revision log and (2) the NWB August 14, 2024 approval (240814 2AM-BRP1831 Updated Water Management Plan) of the May 2024 WMP.

   (1) "Addenda 1" is expected to be the stand-alone document received with file name "240528 2AM-BRP1831 Water Management Plan Version 5 Addendum 01-IMLE Addendum 1 to Water Management Plan Version 4; April 2022", which describes changes from WMP Version 4 to Version 5.

   (2) The WMP approval document includes a summary of B2Gold Nunavut commitments and responses to intervenor comments regarding the WMP. The approval is without conditions but closes with: "The NWB encourages the Licensee to address the intervenors' recommendations in the next revision of the approved plan.

B2Gold Reply (August 22, 2028):

"B2Gold Nunavut appreciates this input and will incorporate these edits in the next update of this plan."

CIRNAC Response to Reply:

(R-02) CIRNAC appreciates the Technical comment provided. However, the response is inadequate because:

- The offer to "incorporate these edits in the next update of this plan" does not provide the requested minor revisions to the May 2024 SWMP that are necessary for its implementation as a regulatory document, and

- It is unknown if or when the SWMP might be revised, as an update is not presently planned or required. It is important for identified revisions to be made to the current SWMP which may be the final document of record to guide the project to completion.

CIRNAC restates previous recommendations.

5. Landfill & Waste Management – General

Reference:

- Section 9 of the 2024 Annual Report for Water Licence 2AM-BRP1831
- Goose & MLA Project Sites – 2024 Annual Geotechnical Inspection

Comment:

Section 9 of the Annual Report references Tables B-1 and B-2 for quantities and types of waste backhauled to KBL Environmental.

Waste incinerated, open burned and waste oil use as heating oil quantified in Tables B-3 and B-4 - Data for MLA property is only recorded for one month.

Non-hazardous waste is disposed at the Waste Rock Storage (WRSA Landfill – quantities were not tracked in 2024 but estimated based on 20 m^3/day. The concern is that without a proper understanding of the amount of waste being generated it is impossible to determine if existing infrastructure will be capable of holding the waste. If an estimation is allowed to continue then it could create significant risks of landfilling beyond approved limits. This could in turn lead to contaminants not contained, limit aggradation of permafrost, resulting in the potential for leaching of waste constituents during seasonal thaw.

Temporary landfill/storage for waste is reported to be continued at the Goose Quarry (2024 Geotechnical report sec. 5.2.1. The report indicates that scattered litter occurs at this site. The concern is that this litter may end up in nearby waterbodies.

The 2024 Geotechnical report identified the landfill at the Echo WRSA Waste Rock fill is located outside the final design footprint and is near the outside edge of the rock fill. The Back River Mine Landfill & Waste Management Plan V.4.0 is included in the annual report as Appendix G and includes a concept cell design (Figure 3). The landfill is intended to be incorporated into the Waste Rock fill with the design and operation intended for aggradation of permafrost. If the location of solid waste fill is in close proximity to outside slopes of the WRSA as stated in the 2024 Geotechnical report, it may affect slope stability and reduce aggradation of permafrost into the waste fill. Thawing of permafrost in the solid waste fill can potentially result in migration of contaminants and impact surface water.

B2Gold Nunavut submitted a response to the July 12, 2024, inspection report. For the Back River Project, B2Gold Nunavut identified the old Airstrip Quarry as the temporary landfill location in advance of the WRSA construction. The Echo WRSA was constructed and in use as of June 2024. B2Gold Nunavut committed to providing a formalized plan in Q1, 2025 for disposing of the inert non-hazardous waste in the temporary disposal area.

A typical engineered drawing for landfills within WRSA's was attached to the response letter (Appendix A) that was included in the Type A Water Licence Application. This drawing illustrates the waste fill located centrally in the WRSA. The drawing appears to be conceptual.

Recommendation:

(R-05) CIRNAC recommends that:

a. The annual report identify the temporary landfill/storage of waste at the Goose Quarry and identify proposed actions to limit or prevent scattering of litter.

b. That waste disposal quantities be tracked and not estimated.

c. Conduct annual surveys of the landfill disposal sites to confirm fill quantities, delineate the landfill footprint and location, and to confirm landfill operation are contained within the approved design boundaries.

d. That landfill cell designs include drawings that specifies lateral and vertical dimensions and be submitted to the Water Board for review before its construction as required by the Water Licence.

e. That surveys be conducted to confirm the lateral and vertical location of landfilled waste at the Echo Waste Rock Fill and the waste fill complies with the approved plan.

f. That B2Gold Nunavut submit engineering plans for landfill cells that include specific cell design lateral and vertical fill dimensions. The design should include a design report that addresses slope stability and aggradation of permafrost.

Should it be determined by surveys, that landfill operations have occurred outside the approved cell design footprint, the landfill waste fill should be relocated and placed within the approved cell design footprint.

B2Gold Reply (August 22, 2028):

"B2Gold Nunavut appreciates CIRNAC's continued diligence, comments and recommendations concerning the Landfill and Waste Management at Goose Mine and our landfill operations. We have reviewed the specific points raised in your correspondence and offer the following responses for your consideration:

1. B2Gold Nunavut has taken action on the former temporary landfill/Goose quarry by removing all refuse, segregating it, and landfilling remaining inert materials. The area is now solely used for open burns of clean wood and cardboard and will therefore minimize the potential of windblown litter.

2. B2Gold Nunavut have employed the use of aerial drones to quantify the volume of waste materials deposited in each cell that's constructed within a waste rock storage area. These volumes will be reported in the 2025 Annual Report and future reports.

3. B2Gold Nunavut wish to reaffirm that surveys of the landfill are completed bi-weekly to ensure that the landfill footprint, location, and operations are delineated as well as within approved boundaries.

4. B2Gold Nunavut wish to confirm that our current operational procedures already encompass a robust design and review process that consistently meets, and often exceeds, the intent of our Water License requirements. All new landfill cells are designed with clearly defined lateral and vertical dimensions, which are inherently incorporated into our internal engineering drawings and design plans. These plans and essential landfill cells are developed by qualified professionals and are fundamental to our continued operations. B2Gold Nunavut's originally approved Landfill and Waste Management Plan indicated that landfills will be constructed within WRSAs, which does not require the additional auspice of submittal to the NWB.

5. B2Gold Nunavut agree with CIRNAC's comment regarding the principle of ensuring waste placement aligns with approved plans. Our operational protocols already include regular monitoring and internal surveying, as part of our quality control process, to ensure waste is placed in accordance with our approved operational plans and permits. These internal checks are designed to confirm both the lateral extent and vertical progression of waste placement. This current practice effectively ensures compliance with approved plans and has proven adequate for effective management and regulatory oversight to date.

6. B2Gold Nunavut will commit to providing more detailed design drawings in future annual reports but are concerned that imposing additional formal submission requirements for documentation that is already generated internally as part of our due diligence may represent an unnecessary administrative burden without providing a commensurate increase in environmental protection or regulatory oversight effectiveness. B2Gold Nunavut agree with CIRNAC's final statement and we wish to reaffirm that it is our absolute commitment that all waste placement occurs strictly within approved design footprints. B2Gold Nunavut's internal controls and monitoring are specifically in place to prevent such occurrences.”

CIRNAC Response to Reply:

(R-05) CIRNAC restates recommendation.

6. Landfill & Waste Management – Incinerator Testing

Reference:

- Section 10 of the 2024 Annual Report for Water Licence 2AM-BRP1831

Comment:

B2Gold Nunavut notes that incinerator testing was not completed in 2024. The Nunavut Department of Environment Guideline for the Burning and Incineration of Solid Waste (2010, Revised January 2012) provides best management practices. Table 2 lists waste that can be burned or incinerated, and those that may be incinerated if equipment has sufficient air pollution controls. Table 3 identifies basic parameters to be measured and recorded. Furthermore, the guideline recommends a one-time or continuous emission monitoring, depending on the type and quantity of waste incinerated, including oxygen and carbon monoxide in undiluted gases. Annual or periodic stack sampling for hydrogen chloride, dioxins and furans may be required where feedstocks include organic materials that contain chlorine, such as chlorinated solvents and plastics, PVC, or marine driftwood.

B2Gold Nunavut does not provide rationale for omitting stack sampling in 2024. B2Gold Nunavut had indicated in response to the 2023 annual report recommendations that a new incinerator is scheduled to be commissioned in 2025.

Recommendation:

(R-06) CIRNAC recommends that B2Gold Nunavut provide their rationale for omitting stack sampling of incinerators in 2024.

It is recommended that B2Gold Nunavut submit plans and details for installation of the proposed new incinerator. This should include a proposed schedule and commissioning plan for the incinerator. The schedule for stack sampling and ash sampling should be provided for 2025.

B2Gold Reply (August 22, 2028):

“B2Gold Nunavut will be receiving a containerized incinerator system (ECO M2TN) incinerator on the 2025 sealift, which will be transported to the Goose Property on the 2025/26 Winter Ice Road and installed shortly after arrival in early/mid 2026. This incinerator is designed to address the types of wastes produced at the Back River Project and meet

stack testing guidelines. This incinerator will be tested in 2026, following commissioning. Commissioning will include enclosing the incinerator to improve burn efficacy and reduce emissions and the installation of stack testing monitoring ports."

CIRNAC Response to Reply:

(R-06) CIRNAC notes that B2Gold confirmed that a new incinerator will be installed in 2026 and testing will commence in 2026. However, B2 Gold did not comment on the rationale for omitting stack sampling in 2024 of the existing incinerator. CIRNAC recommends that stack sampling be provided in future annual reports to confirm that complete combustion is achieved so the possibility of dioxins and furans do not end up in the water column. CIRNAC also recommends that a rational for omitting the stack sampling done in 2024 be provided in the next annual report or in the next iteration of comments on the 2024 annual report.

11. Acid Rock Drainage & Metal Leaching – SFE Testing

Reference:

- 2024 Annual Report for Water Licence 2AM-BRP1831, Appendix F Item 2.6a
- Back River Project Waste Rock Management Plan (WRMP), November 2020

Comment:

The WRMP specifies that "*Short-term leach testing following the shake flask extraction (SFE) method will be conducted on [a] subset [of the samples] to confirm the metal leaching potential of NPAG material, this testing is not required for PAG samples, as PAG waste rock will not be used in construction*".

The WRMP indicates that "*NPAG samples analyzed for SFE will be compared to 10x CCME guidelines for aquatic life to confirm metal leaching potential. Material with a high metal leaching potential will also not be used for WRSA cover material".*

The WRMP also provides contingency Waste Rock Management Contingency Strategies (Table 8-1) for a scenario of "*Neutral metal leaching from the NPAG material may be greater than expected".*

As per Water Licence 2AM-BRP1831 Part D, Item 5, only waste rock to be confirmed to be NPAG and non-metal leaching may be used as construction material.

The annual report does not indicate that SFE testing was completed on any samples. Item 2.6a of Appendix F presents classification criteria for PAG and NPAG and indicates that the baseline geochemical assessment identified that PAG samples were determined to have

metal leaching potential due to the potential for acidic pH but does not make mention of potential for metal leaching from NPAG samples.

Recommendation:
(R-11) CIRNAC recommends that B2Gold Nunavut confirm if any SFE testing has been completed during 2024, and to provide a summary of the results or justification for the testing not having been completed.

B2Gold Reply (August 22, 2028):

"B2Gold Nunavut did not undertake any SFE testing during 2024. The baseline geochemistry characterisation indicated that metal leaching was not indicated for NPAG material, but may be associated with PAG material. NPAG and PAG classification (Modified Sobek Method) and physical segregation as well as downstream containment are used to manage potential metal leaching."

CIRNAC Response to Reply:

(R-11) CIRNAC notes that B2Gold Nunavut's reply states that "baseline geochemistry characterization indicated that metal leaching was not indicated for NPAG material". However, B2Gold Nunavut did not specify the test method used. It is recommended that B2Gold Nunavut provide details on the testing that was completed and confirmation that the testing was completed on samples that are representative of the excavation areas in 2024.

13. Hazardous Materials Management – Residual Waste Impacts

Reference:

- 250507 2AM-BRP183 2024 Annual Geotechnical Inspection Report section 5.3.2 Former Temporary Fuel Containment

Comment:
The geotechnical inspection report identified concerns that the former fuel storage may have negatively impacted the local soils (i.e., "*SRK understands that this area is in the process of being decommissioned. It is suggested that a more formal remediation plan, or increased monitoring plan to better monitor the disturbance, be developed for this area once the tanks and remaining insta-berm structure are removed".*)

Recommendation:
(R-13) CIRNAC recommends that B2Gold Nunavut prepare an investigation plan to evaluate potential residual waste impacts following decommissioning, and if applicable prepare a remediation plan to restore this area.

B2Gold Reply (August 22, 2028):

"B2Gold Nunavut will be transitioning material out of there this year. The tanks originally placed down there continue to be re-purposed, including the Instaberms, and water will be managed as per the Type A Water Licence. B2Gold Nunavut will thicken the pad as per the Project's Geotechnical Design Criteria if we plan to re-utilize the area, or if not, incorporate this area within the Closure and Reclamation Plan as suggested by CIRNAC."

CIRNAC Response to Reply:

(R-13) CIRNAC restates recommendation. Before B2Gold Nunavut re-utilize the area they should conduct a testing program to confirm/refute the potential presence of soil contamination is recommended in conjunction with the temporary fuel containment area decommissioning to allow informed management decisions.

The testing program should be sufficient to determine if remedial action should be conducted immediately or if the impacts are suitable for management within the Closure and Reclamation Plan.

15. Geochemical Properties of Overburden Materials

Reference:

- Back River Project 2024 Annual Report to the Nunavut Impact Review Board (NIRB), Section 4.5.5, Page 4-49 to 4-50
- CIRNAC Comments on the 2023 Annual Report to the NIRB (CIRNAC #6)

Comment:

In response to the 2023 Annual Report to the NIRB, CIRNAC recommended that B2Gold Nunavut provide the quantities of any material stripped, stockpiled, or used elsewhere on site, along with any supporting geochemical analysis. B2Gold Nunavut did not provide this information in response to CIRNAC's comment.

The 2024 Annual Report to the NIRB indicates that pre-stripping from the Echo Pit has been completed and mining has commenced, and that pre-stripping of the Umwelt Pit has commenced.

In the 2024 Annual Report to the NIRB, B2Gold Nunavut has indicated that aggregate production from the designated quarries has been limited, as "…the pit development is providing sufficient material for construction use". B2Gold Nunavut further indicates that an Acid-Base Accounting (ABA) program has been initiated in 2024, which allows for the delineation of non-acid generating (NAG) and potentially-acid generating (PAG) materials.

The geochemical information on overburden materials used for construction have not been provided, nor have the quantities, analysis, and storage location of any PAG material. Without this information, it is unclear to CIRNAC if the materials used for construction are acceptable and will not impact receiving terrestrial and aquatic environments.

CIRNAC is of the view that a comprehensive analysis of overburden materials is required to support a thorough understanding of the ARD/ML potential of materials used to support the development of the project, which is consistent with Part D, Item 5 of 2AM-BRP1831:

"*The Licensee shall use Waste rock and fill material for Construction only from approved sources that have been demonstrated, by appropriate geochemical analyses, to not produce Acid Rock Drainage and to be Non-Metal Leaching, and free of contaminants*".

Recommendation:

(R-15) CIRNAC recommends that B2Gold Nunavut:

1. Provide the quantities, locations, and relevant analysis of material stripped as part of the mine development.
2. Provide the geochemical analysis (ABA) of all overburden materials used for construction.
3. Provide the locations for storage of any PAG overburden material.

B2Gold Reply (August 22, 2028):

“As noted in the Waste Rock Management Plan, and the Projects Geochemical Characterization Report, overburden has been classified as NPAG with no ML/ARD potential. B2Gold Nunavut wishes to highlight that while minimal volumes of overburden have been utilized for construction purposes (see Appendix A), it is primarily being stockpiled for reclamation purposes. Furthermore, overburden stockpiles are monitored as per the Type A Water Licence for seeps and if any runoff is observed (which it has not been to date) will be sampled and results provided within the Annual Report.”

CIRNAC Response to Reply:

(R-15) CIRNAC restates recommendation above.