B2GOLD CORP.
Suite 3400, Park Place, 666 Burrard Street
Vancouver, British Columbia, Canada, V6C 2X8
Telephone: +1 604 681 8371
www.b2gold.com

MEMO

From	Chris LeGoffe, Superintendent, Environment, B2Gold Nunavut
To	Richard Dwyer, Manager of Licensing, Nunavut Water Board (NWB)
Cc	Ali Shaikh, Technical Advisor, Nunavut Water Board (NWB) Sergey Kuflevskiy, Technical Advisor, Nunavut Water Board (NWB) Dan Gagnon, General Manager, B2Gold Nunavut Jamie Richards, Operations Manager, B2Gold Nunavut Braeden Connor, Environmental Permitting Manager, B2Gold Nunavut
Ref.	2AM-BRP1831 Amendment No. 1
Date	10 NOV 2026
Subject	2027 Winter Ice Road Technical Memo – B2Gold Nunavut

Dear Mr. Dwyer,

B2Gold Back River Corp (B2Gold Nunavut) received on October 29, 2026, from the Nunavut Water Board (NWB), review comments for the 2027 Winter Ice Road Technical Memorandum.

Responses were received from Fisheries & Oceans Canada (DFO) and the Kitikmeot Inuit Association (KIA). No responses were received from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC). B2Gold Nunavut has reviewed the comments and provides responses and clarification requested in the following sections.

Should you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Chris LeGoffe

Chris LeGoffe, EP
Superintendent, Environment
B2Gold Nunavut

1. KITIKMEOT INUIT ASSOCIATION (KIA)

1.1 COMMENT #1 – 6. WINTER ICE ROAD CLOSURE

All temporary infrastructure, including radio towers, signage and field supplies, will be demobilized and consolidated at the AKMLA, AKMLA Forward Camp, Goose Forward Camp, and Goose Mine for offseason storage.

Ensuring AKMLA Forward Camp and Goose Forward Camps commit plans to remediate, decontaminate and site restoration plan is established for all temporary locations once operations conclude.

B2Gold Nunavut Response to KIA Comment #1:

B2Gold Nunavut acknowledges the Kitikmeot Inuit Association's (KIA) comment. B2Gold Nunavut confirms that operational protocols for temporary forward camps along the Winter Ice Road (WIR) corridor—including the AK MLA and Goose Forward Camps—include routine environmental inspections, progressive cleanup, and seasonal decommissioning prior to WIR demobilization.

Specifically, prior to seasonal WIR closure, each forward camp location will undergo a detailed environmental inspection to ensure all temporary supplies, waste, and equipment are removed or consolidated, and that any required localized remediation or decontamination is executed while seasonal overland access allows. In addition, periodic environmental inspections will be conducted at these locations during active WIR operations and during open-water summer monitoring programs.

Long-term site restoration and final remediation of all temporary infrastructure sites will be executed in accordance with the site's approved *Closure and Reclamation Plan* and applicable land use permit and water licence obligations.

2. FISHERIES & OCEANS CANADA (DFO)

2.1 COMMENT#1 – WINTER WATER WITHDRAWAL

Excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat. B2Gold Nunavut have addressed this concern sufficiently by adhering to the appended Winter Ice Road Water Withdrawal Evaluation – Back River Project (2018). This evaluation is protective of fish habitat by following the upper threshold of under-ice water volume loss of 10% as stipulated in the DFO Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (2010). The methods in the 2018 evaluation also improve upon the protocol by accounting for waterbodies with a lower surface area to water volume ratio where a 10% loss in under-ice volume would result in a comparatively higher amount of littoral habitat loss (potentially impacting incubating eggs). The memo also stipulates that water withdrawal from lakes will have to maintain a minimum of 2-meters water depth below ice to conform with the DFO protocol.

An additional mitigation within the DFO protocol, not mentioned in the memo, is to place water intakes in the deeper areas of waterbodies, away from the littoral zone, to avoid deoxygenating oxygen-rich

waters near the surface. B2Gold Nunavut should also follow this aspect of the protocol where possible. DFO recommends this mitigation measure be added into the memo for future submissions

B2Gold Nunavut Response to DFO Comment #1:

B2Gold Nunavut acknowledges Fisheries and Oceans Canada's (DFO) comment and recommendation regarding intake screen placement within waterbodies during winter water withdrawal operations.

B2Gold Nunavut confirms that operational practices align with the *DFO Protocol for Winter Water Withdrawal from Ice-Covered Waterbodies in the NWT and Nunavut (2010)*. Specifically, field crews position water intake hoses and screens in deeper offshore zones of approved waterbodies—away from shallow littoral zones—where ice thickness and safe field conditions allow, maintaining a minimum 2-metre water depth below ice.

B2Gold Nunavut commits to explicitly incorporating this intake placement mitigation into future updates of the *Winter Ice Road Water Withdrawal Evaluation* memo and relevant site standard operating procedures (SOPs).

2.2 DFO COMMENT #2 – END OF PIPE FISH SCREEN

The technical memo references DFO Code of Practice: Water Intake Screens for the Protection of Fish, a guidance document which applies to withdrawing water from fish bearing waters. Please note that this Code of Practice is out of date and has been replaced by DFO Interim Standard: Water intake end-of-pipe fish screens. Please update the memo with this reference, where applicable, and adhere to all relevant avoidance and mitigation measures described within.

B2Gold Nunavut Response to DFO Comment #2:

B2Gold Nunavut acknowledges Fisheries and Oceans Canada's (DFO) comment regarding updated guidance documents for fish protection.

B2Gold Nunavut confirms that references to the former guidance document will be updated to align with the current *DFO Interim Standard: Water Intake End-of-Pipe Fish Screens* in future revisions of the *Winter Ice Road Technical Memo* and associated water withdrawal plans.

B2Gold Nunavut also confirms that all water intake equipment utilized during Winter Ice Road (WIR) operations will strictly adhere to the avoidance, mitigation, mesh sizing, and approach velocity criteria specified in the DFO Interim Standard.

2.3 DFO COMMENT #3 – LAKE 997

As reported previously by B2Gold Nunavut, Lake 997 winter water withdrawals exceeded thresholds in both the previous two winter ice road seasons. The DFO Protocol for Winter Water Withdrawal from Ice-Covered Waterbodies in the Northwest Territories and Nunavut stipulates mitigations for protecting fish and fish habitat, most notably the maximum withdrawal of 10% of an ice-covered waterbody's water volume. However, B2Gold Nunavut withdrew 44.8% (2024/2025) and 16.5% (2025/2026) from Lake 997 in the last two years. Due to these exceedances in water withdrawal for the two past years consecutively, it is assumed the lake has not yet returned to its natural (pre-exceedance) condition.

B2Gold Nunavut and DFO have been working collaboratively to address this situation. In the open-water season of 2026, B2Gold Nunavut collected eDNA samples from Lake 997 and submitted them for lab analysis to determine whether this lake is fish-bearing or not. The results have not yet been presented to DFO. If the results confirm fish presence, then an assessment of any harmful alteration, disruption, or destruction of fish habitat and death of fish will need to be completed, potentially followed by enforcement actions from DFO's Conservation and Protection program. Assuming the lake is fish-bearing, and that lake water levels have not returned to natural conditions, continuing water withdrawal could exacerbate any potential impacts to fish and fish habitat. Therefore, until an assessment has been completed and the issue has been resolved, DFO advises no further water withdrawal from Lake 997. Alternatively, if B2Gold Nunavut can confirm that water levels have returned to their natural conditions, then DFO will be satisfied with water withdrawal continuing in Lake 997 in the 2026/2027 winter ice road season.

B2Gold Nunavut Response to DFO Comment #3:

B2Gold Nunavut acknowledges Fisheries and Oceans Canada's (DFO) comment regarding historic water withdrawal, eDNA sampling results, and recharge status for Lake 997.

B2Gold Nunavut is working directly with qualified environmental consultants to finalize a comprehensive technical review for Lake 997 and confirms the following ongoing actions:

- **eDNA and Fisheries Analysis:** eDNA laboratory results from the 2026 open-water sampling program were recently received by B2Gold Nunavut and will be shared with DFO. B2Gold and our consultants are currently evaluating these results and will provide a formal response to DFO in the coming weeks. This was discussed with DFO during the meeting on October 22nd, 2026, with B2Gold to schedule a meeting in November to present the results.
- **Bathymetric & Recharge Evaluation:** B2Gold completed a bathymetric survey of Lake 997 in September 2026. Photos collected of the lake from this event visually show that Lake 997 has recovered to pre-withdrawal levels and shows discharge from the lake. Photos of Lake 997 are provided as Attachment A to this response package.
- **Agency Engagement Prior to WIR Operations:** Prior to commencing water withdrawal from Lake 997, B2Gold Nunavut will engage with DFO and submit a hydrologic impact assessment for the lake. B2Gold Nunavut confirms that water withdrawal from Lake 997 will not proceed for the 2026/2027 WIR season unless hydrological recharge is verified and written alignment is reached with DFO, ensuring full compliance with the *Fisheries Act* and project water licence conditions.

2.4 DFO COMMENT #4 – UPDATED ROAD SIGNAGE AND WATER WITHDRAWAL TRACKING

In addition to the increased withdrawal from Lake 997, 1,884 m^3 of water was withdrawn from unknown water sources along the winter ice road during the 2025/2026 ice road season. DFO provided comments on this in response to B2Gold Nunavut's *Back River Project 2025 Annual Report for Water Licence 2AM-BRP1831*.

B2Gold Nunavut previously proposed measures to avoid these issues in under-ice water withdrawal along the winter ice road from re-occurring. These measures included posting clear signage at each

authorized water source, updating the water tracking spreadsheets, requiring more regular review of water usage against limits, and requiring withdrawal from depth, in deeper lake areas to avoid taking more oxygenated surface water to reduce risks associated with potential over withdrawal. DFO anticipates these additional measures will avoid both i) exceedances in under-ice water withdrawal, and ii) withdrawing water from unknown water sources. DFO will however, continue to monitor water withdrawal activities along the winter ice road, and work collaboratively with B2Gold Nunavut to address any future issues.

B2Gold Nunavut Response to DFO Comment #4:

B2Gold Nunavut acknowledges Fisheries and Oceans Canada's (DFO) comment regarding winter water withdrawal tracking and source management along the Winter Ice Road (WIR) corridor.

B2Gold Nunavut confirms the implementation of enhanced management controls and supervisory oversight for the upcoming 2026/2027 WIR campaign to prevent water withdrawal from unapproved sources and ensure compliance with authorized volumetric limits under Water Licence 2AM-BRP1831. Specifically, these measures include:

- **Clear Field Signage:** Physical posting of standardized, highly visible signage identifying authorized water sources and maximum allocation limits at every approved lake intake site prior to pumping operations.
- **Enhanced Tracking & Reporting:** Updated daily water tracking logs and streamlined reporting frameworks to ensure real-time reconciliation of daily and cumulative withdrawal volumes against licensed thresholds.
- **Field Supervision & Environmental Oversight:** Increased direct supervisory and environmental personnel presence along the WIR corridor during both construction and operational phases to enforce strict adherence to approved intake locations, intake depth placement, and pumping protocols.

B2Gold Nunavut remains committed to continuous improvement, strict regulatory compliance, and working collaboratively with DFO to ensure transparent water use reporting across all project activities

2.5 DFO COMMENT #5 – ICE ROAD CONSTRUCTION AND DECOMMISSIONING

The winter ice road will likely require several crossings over watercourses, including the construction of ice bridges and snow fills. The improper construction, maintenance, or decommissioning of these crossings can impact fish and fish habitat through the disturbance of watercourse beds and banks, the release of sediments or other deleterious substances, and injury or mortality of fish by entrainment and impingement.

B2Gold Nunavut addressed mitigating impacts during the decommission of the road in the memo, stating "closure activities will focus on the protection of fish and fish habitat by ensuring sediments or other deleterious substances do not cause mortality of fish and maintain safe passage of fish for all crossings."

The *DFO Code of Practice Ice bridges and snow fills: Construction, maintenance and decommissioning* provides guidance on both the construction and decommissioning of winter water crossings, including

several measures to protect fish and fish habitat specific to this activity. Please update the memo with this reference, where applicable, and adhere to all relevant avoidance and mitigation measures described within.

B2Gold Nunavut Response to DFO Comment #5:

B2Gold Nunavut acknowledges Fisheries and Oceans Canada's (DFO) comment regarding watercourse crossings for the Winter Ice Road (WIR).

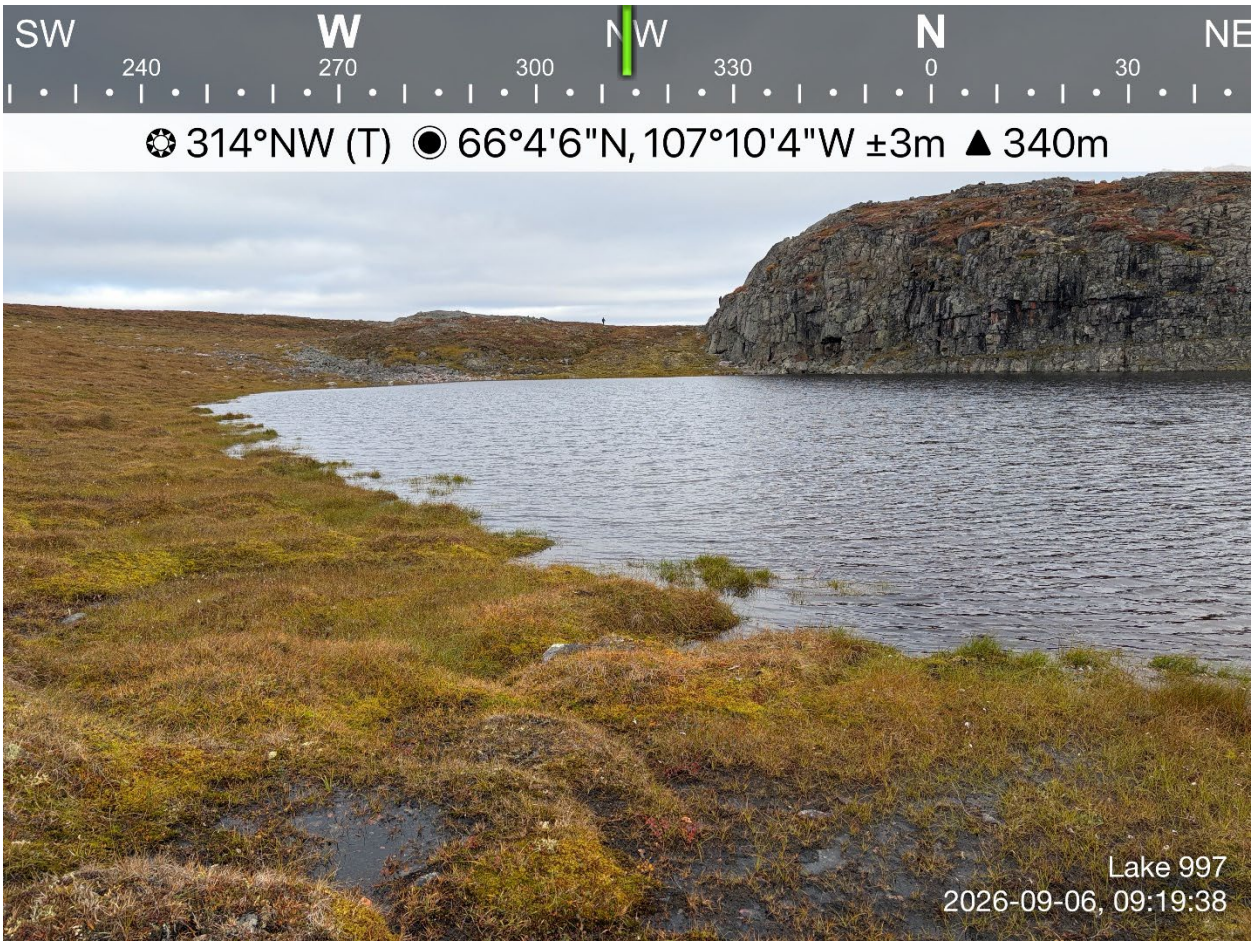
B2Gold Nunavut confirms that references to the DFO Code of Practice: Ice Bridges and Snow Fills (Construction, Maintenance, and Decommissioning) will be integrated into future updates of the Winter Ice Road Technical Memo and associated site operational procedures.

Furthermore, B2Gold Nunavut confirms that all design, construction, maintenance, and seasonal decommissioning of ice bridges and snow fills along the WIR corridor will strictly adhere to the avoidance and mitigation measures outlined in the DFO Code of Practice. Key operational mitigations include:

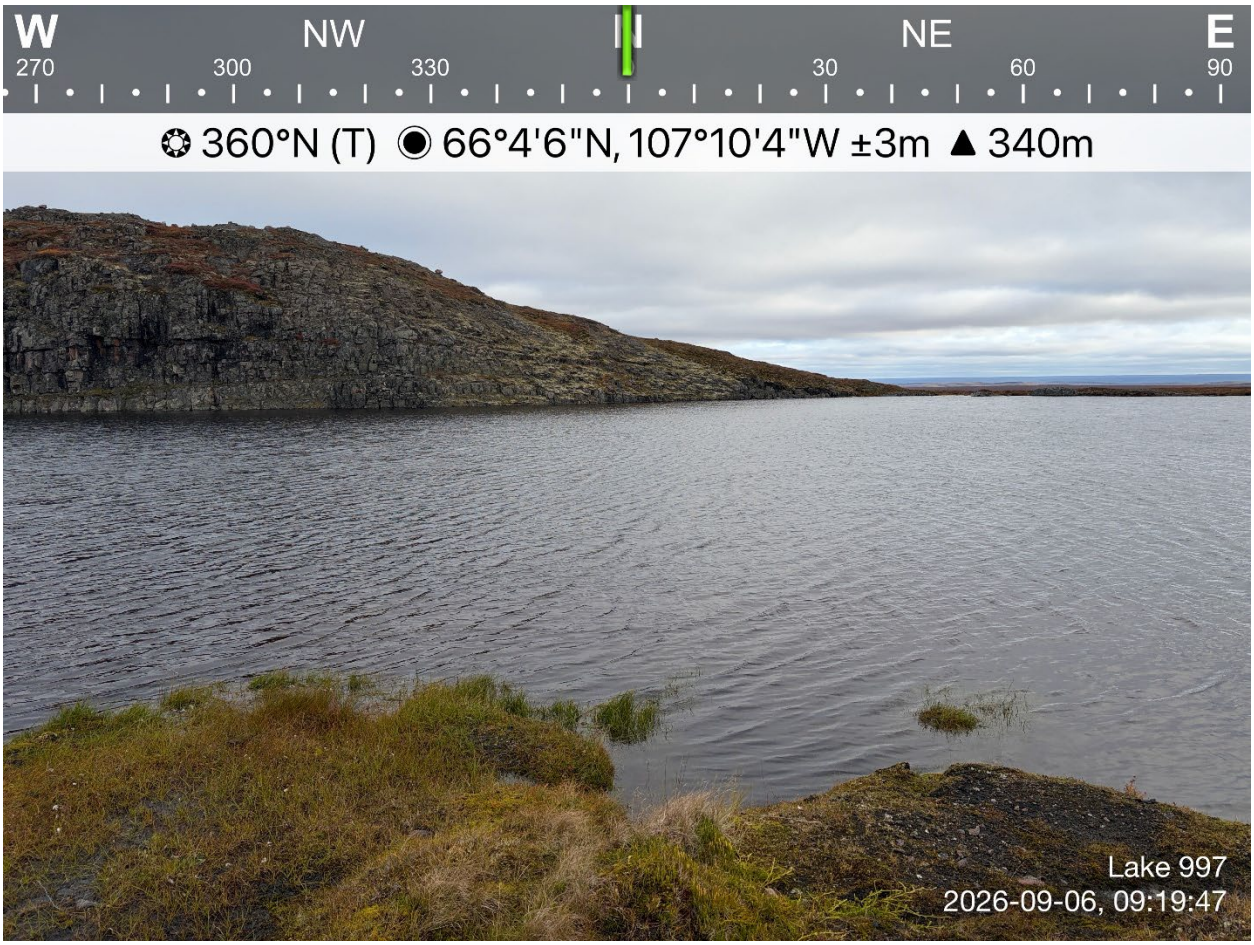
- Utilizing only clean ice, snow, and water to construct crossings, ensuring no soil, gravel, or organic debris is deposited in watercourses.
- Protecting watercourse banks and riparian vegetation from mechanical disturbance during construction and equipment transit.
- Executing progressive decommissioning prior to spring freshet, including clean-up of any debris and appropriate breaching/v-notching of snow fills and ice crossings to prevent damming, thermal erosion, bed disturbance, or obstruction of fish passage.

ATTACHMENT A: PHOTOS OF LAKE 997




SW
W
NW
N
NE
240
270
300
330
0
30
314°NW (T)
66°4'6"N, 107°10'4"W ±3m
340m
Lake 997
2026-09-06, 09:19:38


NW
N
NE
E
SE
330
0
30
60
90
120
44°NE (T)
66°4'6"N, 107°10'4"W ±3m
339m
Lake 997
2026-09-06, 09:19:54


W
NW
NE
E
270
300
330
30
60
90
360°N (T) 66°4'6"N, 107°10'4"W ±3m 340m
Lake 997
2026-09-06, 09:19:47