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**B2GOLD CORP.**

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## MEMO

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**From** Chris LeGoffe, Superintendent, Environment, B2Gold Nunavut

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**To** Richard Dwyer, Manager of Licensing, Nunavut Water Board (NWB)

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**Cc** Ali Shaikh, Technical Advisor, Nunavut Water Board (NWB)  
Karén Kharatyan, Director of Technical Services, Nunavut Water Board (NWB)

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**Ref.** 2AM-BRP1831

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**Date** 1 April 2026

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**Subject** Modification under Part G of 2AM-BRP1831 and related Schedule A Update

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Dear Mr. Dwyer,

Please find B2Gold Nunavut's responses to comments received regarding the proposed modification package for the sewage treatment plant (STP) at the Marine Laydown Area. Responses were received from the Kitikmeot Inuit Association (KIA), Fisheries & Oceans Canada (DFO), Environment and Climate Change Canada (ECCC) and Crown Indigenous Relations & Northern Affairs Canada (CIRNAC). Of the four (4) regulatory bodies' responses, only CIRNAC provided one recommendation, which has been addressed below. The remaining three (3) regulatory bodies had no comments or concerns regarding this proposed modification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Macoura Kone', written over a horizontal line.

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**Macoura Kone, Ph.D, P. Geol., P. Geo.**  
Manager Environment  
B2Gold Nunavut

**Cc:** Dan Gagnon, General Manager, B2Gold Nunavut  
Jamie Richards, Operations Manager, B2Gold Nunavut  
Clinton Wakefield, Operations Manager, B2Gold Nunavut

<b>Interested Party:</b>	<b>Crown Indigenous &amp; Northern Affairs Canada (CIRNAC)</b>	<b>TRC NO.:</b>	<b>CIRNAC-R-01</b>
<b>Re:</b>	<b>Notification of modification under Part G of 2AM-BRP1831 and related Schedule A Update</b>		

## CIRNAC's REVIEW RESULTS

### Comment:

Part G-3g of the Water License 2AM-BRP1831 requires all modification applications to contain proposed sediment and erosion control measures.

B2Gold stated the following regarding sediment and erosion control measures:

"It is also noted that the downslope receiving environment at the MLA is, and will remain, Bathurst Inlet, and that there is no potential for effects on the freshwater environment or for sedimentation or erosion".

However, CIRNAC is of the opinion that the proposed construction activities have the potential to create sedimentation and erosion.

Section 9.4.1 of the document "201013 2AM-BRP1831 Attachment 2-Appendix B-WaterMgmtPlan-IMLE" provides a discussion of possible sediment and erosion control measures to be used during ongoing construction, but none of these measures have been discussed in the modification request. CIRNAC is concerned that B2Gold may not implement appropriate measures to contain sedimentation and erosion during the proposed construction activities.

### Recommendation:

R-01) CIRNAC recommends that B2Gold propose specific sediment and erosion control measures to be followed during the construction of the toilet facilities and the STP.

### B2Gold Nunavut Response:

B2Gold Nunavut appreciates CIRNAC's detailed review and feedback regarding the modification request for the sewage treatment plant (STP) and associated facilities.

To clarify the project context, the modular units will be placed on a pre-existing, leveled pad within the Marine Laydown Area (MLA) footprint. Given that the site is already constructed (i.e., levelled), no new ground disturbance or major construction is required. However, in recognition of the increased flows and CIRNAC's recommendation, B2Gold Nunavut commits to the following mitigation measures during the installation of the new STP, which is slated to occur in September 2026:

- **Engineered Controls:** B2Gold Nunavut will install sediment and erosion control devices, including properly keyed-in silt fencing and spring berms, to protect the marine receiving environment.
- **Operational Monitoring:** The Environmental Department will conduct weekly inspections of these controls and the discharge area to ensure they remain functional and that no sediment deposition is occurring.

- **Adaptive Management:** If inspections identify any deficiencies, B2Gold Nunavut will implement immediate corrective actions as per the approved Water Management Plan.

B2Gold Nunavut is confident that these measures satisfy the requirements of Part G-3g of Water License 2AM-BRP1831 and ensure the continued protection of the Bathurst Inlet environment.