



File: 2AM-BRP1831/G1

April 17, 2026

Chris LeGoffe
Superintendent, Environment
Sabina Gold & Silver Corp.
c/o B2Gold Corp.
Suite 3400 – 666 Burrard Street
Vancouver, BC V6C 2X8

Macoura Kone
Manager, Environment
Sabina Gold & Silver Corp.
c/o B2Gold Corp.
Suite 3400 – 666 Burrard Street
Vancouver, BC V6C 2X8

Email: CLeGoffe@b2gold.com

Email: Macoura.Kone@b2gold.com

RE: Type A Water Licence No: 2AM-BRP1831 Back River Project; Modification request to add a Sewage Treatment Plant (STP) at the Marine Laydown Area (MLA) and associated updates to Schedule A

Dear Mr. LeGoffe,

On February 24, 2026, the Nunavut Water Board (NWB or the Board) acknowledged receipt of an Application for Modification to replace the existing pacto-toilet based system at the Marine Laydown Area (MLA) with conventional toilet facilities and a Sewage Treatment Plant (STP) as per Part G, Item 1 of the Water Licence No: 2AM-BRP1831 (Licence).

As stated by B2Gold Corp. (Licensee or B2Gold Nunavut (formerly Sabina Gold & Silver Corp.)) the Back River Project is comprised of two main areas with interconnecting winter ice roads: Goose Property and Marine Laydown Area (MLA), which is situated along the western shore of southern Bathurst Inlet. The MLA is a shipping and transportation hub and the main resupply point for the Back River Gold District ensuring that essential goods and materials can be delivered to support operations at the Goose Mine.

In their submission, B2Gold Nunavut has stated that the MLA camp wastewater has been managed as separate streams. Greywater, i.e. water from the kitchen, sinks, showers, and laundry is discharged to the tundra, with treatment as necessary for oil and grease removal. Blackwater, i.e. human waste and toilet paper, is deposited in Pacto toilet facilities, collected, and incinerated. Pacto toilets look similar to typical toilets, but the interior of the bowl is lined with soft clear plastic in which the waste is collected, progressively filling a long clear soft plastic tube. The filled tubes of raw sewage must be removed regularly and subsequently are fed into the MLA incinerator for incineration.

Although Pacto toilets are routinely used in Nunavut at small camps associated with the projects at early exploration stages, such facilities tend to be unappealing to camp personnel at more established facilities. The daily manual handling of raw sewage is unpleasant, and presents an elevated biohazard exposure risk. Incineration of this very wet waste also requires substantial resources (fuel, burn time, and the staggering of incineration to obtain an appropriate waste composition mix for each batch).

B2Gold Nunavut is planning to replace the MLA's current Pacto toilet system with a Sewage Treatment Plant (STP) and standard low-flow flushing toilets. This system will also be capable of receiving and effectively treating the MLA's greywater, providing centralised treatment of domestic wastewater generated by the MLA camp and accommodation facilities. The flexibility to continue using a Pacto system and discharging greywater separately will be maintained as an option during this transition or as needed during operations, or when activities are reduced during closure or post closure.

The MLA STP will be a modular, containerized system similar in overall configuration and performance to the STP currently operating at the Goose Mine. The MLA STP will use a biological treatment process with membrane filtration, as is the case at Goose and consistent with modern containerized sewage treatment systems used in remote northern environments.

The treated effluent will be discharged to land at the proposed monitoring station "BRP-17B" and will meet the effluent quality discharge criteria in Part F, Item 4 of the Water Licence. The Inspector will determine the exact location of the monitoring station and whether additional monitoring stations are required.

Further, the sludge generated from the STP would be directed to "*to the Incinerator, the Landfarms as a soil enhancement, or as otherwise approved by the Board in writing*" as per Part F, Item 5 of the Water Licence.

B2Gold Nunavut has plans to ship the STP to the site during the 2026 shipping season and install it in late summer/fall of 2026 before freeze-up.

On February 24, 2026, the NWB distributed the modification request for public review. Interested parties were invited to comment until March 26, 2026. Submissions were received from the Kitikmeot Inuit Association (KIA), Crown-Indigenous Relations and Northern Affairs Canada (CIRNA), Environment and Climate Change Canada (ECCC) and Fisheries and Oceans Canada (DFO). The KIA, ECCC and DFO, in their submissions, mentioned that they had no comments or concerns regarding this request at this time.

B2Gold Nunavut provided their responses on April 1, 2026. On April 8, 2026 CIRNA provided confirmation that their concerns were addressed.

Copies of all documents received in support of this Modification request can be accessed through the NWB's Public Registry and FTP site using the following Link:

[Modification Request – Installation of STP at the MLA](#)

A summary of comments / responses follows:

Crown-Indigenous Relations and Northern Affairs Canada (March 26, 2026)

1. CIRNA requested more information on the specific sediment and erosion control measures to be followed during the construction of the toilet facilities and the STP.

B2Gold's response: B2Gold Nunavut stated that... *“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.”*

Further, B2Gold Nunavut stated that they would follow mitigation measures including engineered controls (including properly keyed-in silt fencing and spring berms, to protect the marine receiving environment), weekly inspections and adaptive management.

The requested Modification will require revisions to Schedule A and an addition to the monitoring requirements in Schedule I of the Licence.

Schedule A: Scope, Definition and Enforcement

The following definitions will be revised:

“Sewage Treatment Plant” means the package sewage treatment plants as described in the Landfill and Waste Management Plan.

“MLA Wastewater Treatment Facilities” means facilities at the MLA designed reduce the TSS of greywater prior to discharge to land as generally described in the application and the MLA Sewage Treatment Plant.

Schedule I: Table 2 – Monitoring Program

Addition of Monitoring Program Station BRP-17B as a regulated monitoring station for treated sewage discharge immediately prior to the point of entry into the freshwater or marine receiving environment. The modified Table 2 is appended to this letter and the new addition is highlighted in red. It should be noted all requirements of Part F, Item 4 of the Licence will be applicable to this Monitoring Program Station BRP-17B.

NWB's Review and Decision

The NWB, having fully reviewed the Licensee's request in the context of potential impact of the proposed activities on the freshwater environment, and consistency of the proposed activity in relation to the scope of the Licence, determined that the proposed Modification is consistent with the scope of activities considered under the Licence issued to the Project. Therefore, the Board has approved this Modification through the Motion No. 2026-A1-006, dated April 17, 2026, as

required by Part G, Item 2 of the Licence. By way of this correspondence, the Board authorizes B2Gold to go ahead with the addition of a Sewage Treatment Plant (STP) at the MLA.

The Licensee is advised that the Board's review of this document is a verification that the proposed activity is consistent with the existing terms and conditions of the Licence and more specifically with Part G. It should be noted that the Board's acceptance is NOT intended or offered as any representation regarding the suitability of the plans nor third-party verification of the design, construction, planning or engineering discussed in the document.

The Board notes that all relevant management plans shall be updated to reflect the changes through this Modification. All updated documents shall be included within the 2026 Annual Report.

Further, in keeping with Part G, Item 4 of the Licence's terms and conditions, the submission of post-construction information, including as-built plans and drawings, shall remain applicable to this authorization.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,



Mohammad Ali Shaikh
Technical Advisor,
Nunavut Water Board

as/rqd

Cc: Distribution List – Back River Project

Schedule A: Scope, Definitions, and Enforcement

In the Licence: **2AM-BRP1831**

Modified Definitions:

“Sewage Treatment Plant” means the package sewage treatment plants as described in the Landfill and Waste Management Plan;

“MLA Wastewater Treatment Facilities” means facilities at the MLA designed reduce the TSS of greywater prior to discharge to land as generally described in the application and the MLA Sewage Treatment Plant.

Schedule I: Conditions Applying to General and Aquatic Effects Monitoring

MODIFIED TABLE 2 - MONITORING PROGRAM

Monitoring Program Station	Monitoring Type	Description	Mine Phase	Group Code	Frequency
BRP-G-01 to BRP-G-TBD	Regulated Monitoring	General Site Runoff Surficial runoff anywhere at both Goose Property and MLA, including quarries; monitoring for erosion and sedimentation.	Construction	C	Weekly if flow enters a waterbody
BRP-S-01 to BRP-S-TBD	General Monitoring	General Seeps Seepage or runoff from excavated and/or stockpiled material anywhere at both Goose Property and MLA, including quarries, that does not gather into a collection system or the site is reclaimed.	Construction and Operations	A, D	Monthly during flow, or as found
BRP-01	Regulated Monitoring	Goose Lake Discharge (discharge point for release of dewatering effluent with or without treatment)	Construction	A, B, G	Weekly during dewatering
				D	Four times during dewatering, at the same time as the weekly samples
				H	Once per month during dewatering, at the same time as Group D
				I	One time during dewatering, at the same time as Group D
BRP-02	General Monitoring	Llama Lake (intake point for dewatering, triggers need for treatment prior to discharge at BRP-01)	Construction	C (TSS only)	Weekly if treatment is required; no sample if treatment is not required
BRP-03	Verification Monitoring	Llama Pit (representative of collected pit water prior to transfer to tailings management facility)	Operations	A, G	At Licensee's discretion
BRP-04	General Monitoring	Llama Pit Lake (representative of flooded pit during flooding and before overflow to the downstream environment)	Closure* to Post-Closure*	A, D	Twice per year
BRP-05	Verification Monitoring	Llama WRSA Pond (representative of collected water quality)	Operations to Closure*	A, G	At Licensee's discretion
BRP-06	General Monitoring	Umwelt Lake (intake point for dewatering, triggers need for treatment prior to discharge at BRP-01)	Construction	C (TSS only)	Weekly if treatment is required; no sample if treatment is not required
BRP-07	Verification Monitoring	Umwelt Pit (representative of collected pit water prior to transfer to tailings management facility)	Construction to Operations	A, G	At Licensee's discretion

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Modification to install a Sewage Treatment Plant at the MLA

Monitoring Program Station	Monitoring Type	Description	Mine Phase	Group Code	Frequency
BRP-08	General Monitoring	Umwelt Pit Lake (representative of flooded pit during flooding and before overflow to the downstream environment)	Closure to Post-Closure*	A, D	Twice per year
BRP-09	Verification Monitoring	Umwelt WRSA Pond (representative of collected water quality, including landfill seepage/runoff)	Construction to Closure (early)*	A, G	At Licensee's discretion
BRP-10	Verification Monitoring	Primary Water Pond (representative of collected water quality)	Construction to Closure (early)*	A, D	At Licensee's discretion
BRP-11	Verification Monitoring	Saline Water Pond (representative of stored water quality)	Construction (late) to Closure (early)*	A, D	At Licensee's discretion
BRP-12	General Monitoring	Big Lake Intake (intake point for potable and industrial water withdrawal)	Construction to Closure*	A, D	Four times per year
				B	Weekly
BRP-13	Verification Monitoring	Plant Site Pond (representative of collected water quality)	Construction to Closure (early)*	A, D	At Licensee's discretion
BRP-14	Verification Monitoring	ANFO Plant (representative of collected water quality)	Construction to Closure*	A, E	At Licensee's discretion
BRP-15	Regulated Monitoring	Goose Fuel Tank Farm (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-16	Regulated Monitoring	Goose Hazardous Waste Management Area (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-17	Regulated Monitoring	Goose Property Sewage Treatment Plant (treated sewage discharge/drainage immediately prior to the point of entry into freshwater)	Construction to Closure*	A, F	Monthly
BRP-17A	Regulated Monitoring	Goose Property Sewage Treatment Plant (discharge point for treated sewage into Tailings Storage Facility or Tailing Facility)	Construction to Closure*	A, F	Prior to discharge

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Modification to install a Sewage Treatment Plant at the MLA

Monitoring Program Station	Monitoring Type	Description	Mine Phase	Group Code	Frequency
BRP-17B	Regulated Monitoring	MLA Sewage Treatment Plant (Treated sewage discharge/drainage immediately prior to the point of entry into the freshwater or marine receiving environment)	Construction to Closure*	A, F	Monthly
BRP-18	General Monitoring	Llama Watershed Outflow (representative of non-contact water, PN04 from <i>Water and Load Balance</i>)	Operations to Closure*	A, D	Once during freshet and monthly during upstream construction while visible flow is present at the stations
BRP-19	General Monitoring	Echo Outflow (representative of non-contact water). PN09 from water and load balance	Operations to Closure*	A, D	Once during freshet and monthly during upstream construction while visible flow is present at the stations
BRP-20	Verification Monitoring	Echo Pit (representative of collected pit water prior to transfer to tailings management facility)	Operations	A, G	At Licensee's discretion
BRP-21	General Monitoring	Echo Pit Lake (representative of flooded pit during flooding and before overflow to the downstream environment)	Closure* to Post-Closure*	A, D	Twice per year
BRP-22	Verification Monitoring	Echo WRSA Pond (representative of collected water quality)	Operations to Closure (early)*	A, G	At Licensee's discretion
BRP-23	General Monitoring	Gander Pond Outflow (representative of non-contact water, PN07 from <i>Water and Load Balance</i>)	Operations to Closure*	A, D	Once during freshet and monthly during upstream construction while visible flow is present at the stations
BRP-24	General Monitoring	Goose Lake Intake (intake point for potable and industrial water withdrawal)	Operations to Closure (early)*	B	Weekly
BRP-25	Verification Monitoring	Goose Pit (representative of collected pit water prior to transfer to tailings management facility)	Operations	A, G	At Licensee's discretion
BRP-26	General Monitoring	Goose Pit Lake (representative of flooded pit during flooding and before overflow to the downstream environment)	Closure* to Post-Closure*	A, D	Twice per year
BRP-27	Verification Monitoring	Goose Main Tailings Facility (intake point for water treatment, represents pre-treatment water quality)	Operations to Closure*	A, G	At Licensee's discretion
BRP-28	Verification Monitoring	Goose Main Tailings Facility (discharge point for water treatment, represents post-treatment water quality)	Operations to Closure*	A, G	At Licensee's discretion

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Monitoring Program Station	Monitoring Type	Description	Mine Phase	Group Code	Frequency
BRP-29	Verification Monitoring	TSF WRSA Pond (representative of collected water quality, including landfill seepage/runoff)	Operations to Closure*	A, G	At Licensee's discretion
BRP-30	General Monitoring	Goose Southeast Inflow (representative of non-contact water, PN06 from <i>Water and Load Balance</i>)	Operations to Closure*	A, D	Once during freshet
BRP-40	General Monitoring	Bathurst Inlet Intake (intake point in marine environment for potable and industrial water withdrawal)	Construction to Closure*	A, D	At Licensee's discretion
				B	At Licensee's discretion
BRP-41	General Monitoring	Bathurst Inlet Discharge (discharge point in marine environment for effluent from desalinization plant)	Construction to Closure*	A, J	At Licensee's discretion
BRP-42	Regulated Monitoring	MLA Greywater (representative drainage at point of entry to the marine receiving environment)	Construction to Closure*	A, F	Prior to discharge or transfer of water
BRP-43	Regulated Monitoring	MLA Fuel Tank Farm (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-44	Regulated Monitoring	MLA Landfarm (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-45	Regulated Monitoring	MLA Hazardous Waste Management Area (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-49	Regulated Monitoring	MLA Temporary Fuel Storage Facility^a (representative of collected water quality)	Construction	A, E	Prior to discharge or transfer of water
BRP-51	Regulated Monitoring	Goose Landfarm (representative of collected water quality)	Construction to Closure*	A, E	Prior to discharge or transfer of water
BRP-52	General Monitoring	MLA Pond S1 (intake point for potable and industrial water withdrawal)	Construction to Closure*	A, D	Once per quarter when in use
				B	Weekly when in use
BRP-53	General Monitoring	MLA Pond S2 (intake point for potable and industrial water withdrawal)	Construction to Closure*	A, D	Once per quarter when in use
				B	Weekly when in use
BRP-54	General Monitoring	MLA Lake 3 (intake point for potable and industrial water withdrawal)	Construction to Closure*	A, D	Once per quarter when in use
				B	Weekly when in use

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BRP-55	General Monitoring	MLA Lake 4 (intake point for potable and industrial water withdrawal)	Construction to Closure*	A, D	Once per quarter when in use
				B	Weekly when in use
BRP-56	General Monitoring	Llama Tailings Facility (collected at "inlet" to treatment facility Pre-treatment quality)	Operations to Closure	A, G	At Licensee's discretion
BRP-57	General Monitoring	Llama Tailings Facility (after treatment; collected at "outlet" of treatment facility; no discharge to the receiving environment Post-treatment quality to confirm treatment efficiency)	Operations to Closure	A, G	At Licensee's discretion
BRP-58a to BRP-58xx (TBD)	Regulated Monitoring	Final Discharge Point Goose Lake			As per Part F, Item 16
BRP-I-01 to BRP-I-TBD	General Monitoring	Interconnection Winter Ice Road Proximal Water Bodies (intake points for fresh water used in the construction of the Interconnection Winter Ice Road and WIR Service/Emergency Camps)	Construction to Closure*	B	Weekly when in use

Notes: * - The term of this Licence does not include the Closure Phase (either early or late closure) or Post-Closure Phase. Closure and Post-Closure monitoring information is provided for discussion only; a - Monitoring Program Station BRP-49 will no longer be active once the MLA Fuel Tank Farm is operational and the MLA Temporary Fuel Storage Facility has been decommissioned and removed.