Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 115 / 002
NWB File: 2AM-BRP1831

August 28, 2026

via email at: richard.dwyer@nwb-oen.ca

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 2AM-BRP1831 – B2Gold Corp. – Back River Gold Mine Project – Modification Request

Environment and Climate Change Canada (ECCC) has reviewed B2Gold Corp's responses to ECCC's comments regarding the above-mentioned Modification Request.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context do not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments on the Proponent's responses are provided:

1. Waste Management and Monitoring

Comment:
The Proponent has generally responded to the comment and has provided a figure, but the response still doesn't include flow directions to understand the movement of water on site.

Recommendation:
ECCC recommends that flow directions for water management around the waste piles be included in a future update to the Water Management Plan.

2. Scaling of Groundwater Predictions

Comment:
ECCC appreciates the additional context. However, it is not clear how the new inflow rates and concentrations for the changes to the underground developments were determined.

Recommendation:
ECCC recommends the Proponent provide calculations used to scale the groundwater quantity and quality to increase clarity and understanding for all parties.

3. Waste Rock Storage Area – Runoff Volumes and Quality

Comment:
ECCC is satisfied with the Proponent's response.

4. Overburden Storage Areas

Comment:
The response from the Proponent references the future WMP in response to part 2 of ECCC's recommendation, but the response has not addressed parts 1, 3, and 4. The response from B2Gold does not provide specific information on water management for the overburden stockpiles or why they have excluded this from the Water Balance.

Recommendation:
ECCC recommends that the Proponent:

1. Describe how runoff and seepage from the overburden stockpiles will be collected, monitored, and managed, including whether existing water management infrastructure will be utilized or whether additional infrastructure is required.
2. Explain why the overburden stockpiles were excluded from the Water and Load Balance
3. Provide an assessment of the contribution of the overburden stockpiles to the overall site water balance, including expected runoff volumes, potential seepage generation, and any associated constituent loading.

5. Changes to Inflow Rates and Treatment Volumes

Comment:
The response from the Proponent has addressed part 2 of ECCC's recommendation, but the response has not addressed part 1. In the initial application it is unclear how the proposed changes will impact overall water management and water quality. The response from the Proponent that "analysis is ongoing" suggests that the full description of how the modification will impact water management and water quality has not yet been presented.

Recommendation:
ECCC recommends the Proponent provide a consolidated summary of the implications of the proposed mine plan modifications on water quantity and quality, including changes to flow rates, runoff and seepage volumes, water storage requirements, treatment volumes, and contaminant

loadings. The summary should clearly identify the contribution of each modification and demonstrate how these changes have been incorporated into the water balance, water quality predictions, and water management planning.

6. Catchments

Comment:
ECCC appreciates the clarification and error corrections provided by the Proponent's response. However, ECCC maintains the recommendation that the overburden stockpiles from the water collection system and the water and load balance be included and updated.

Recommendation:
ECCC recommends, similarly to ECCC's recommendations in comment 4, that the Proponent clarify the absence of collection on the overburden stockpiles and exclusion from the water and load balance.

7. Tailings Management

Comment:
ECCC is satisfied with the Proponent's response.

8. Dust Management

Comment:
ECCC is satisfied with the Proponent's response.

If you need more information, please contact Erik Allen at erik.allen@ec.gc.ca.

Sincerely,

Graham, Anna
Digitally signed by Graham, Anna
Date: 2026.08.28 14:06:04 -04'00'

Anna Graham
Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)