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Kugluktuk

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
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Bathurst Inlet
Kingaok

Bay Chimo
Umingmaktok

July 31th, 2026

Cambridge Bay
Ikaluktutiak

Re: Modification Request and Updated Management Plans of Interim Closure and Reclamation Plan and Reclamation Cost Estimate (RCE).

Gjoa Haven
Okhoktok

Dear Richard Dwyer, the KIA has reviewed B2Gold Nunavut's Modification Request and Updated Management Plans of interim Closure and Reclamation Plan and Reclamation Cost Estimate (RCE) for the Back River project to the NWB.

Taloyoak

1) Compliance Monitoring:

Kugaaruk

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with B2Gold Nunavut that cover terms and conditions of NIRB Project Certificate 007 and the NWB Type A water license.

The Framework Agreement is a confidential agreement between KIA and B2Gold Nunavut that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by B2Gold Nunavut to the KIA, which is summarized as follows:

B2Gold Nunavut is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, B2Gold Nunavut is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.



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B2Gold Nunavut has provided the KIA with the **Interim Closure and Reclamation Plan and Reclamation Cost Estimate (RCE) (Version 5.0, dated June 2026)** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Back River 2025 Annual Report to the NWB**.

Compliance Status

2) Effects of Monitoring:

- a) Overall, our consultants find B2Gold Nunavut's conclusions in the modification request to the NWB to be valid. However, the review identified several items where clarification or supporting information is required to confirm conformance with specific license requirements.
- b) **Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.**

Back River Project Interim Closure and Reclamation Plan and Reclamation Cost Estimate (RCE) to NWB

KIA-NWB-01

Review Comment Number	KIA-NWB-01
Subject/Topic	Reclamation and revegetation
References	Interim Closure and Reclamation Requirements
Summary	The key for reclamation and revegetation in the Arctic, is that they must test local conditions and as such, they will have to establish test plots to test different types of local plants/seeds and evaluate which will grow the best.



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Detailed Review Comment	The ERM report, which includes an extensive literature review, specifically mentions that climate change must be considered in the species selection, which is critical. Using the BC MCM guidelines is good, but B2Gold also must acknowledge that the warming and changes in the Arctic are likely more rapid than in southern regions.
Recommendation/ Request	Establish test plots for local plants/seeds and evaluate what grows best with KIA and Traditional Knowledge.
Importance	High

Thank you.

Janet Kadlun
Senior Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Cory Barker, Interim Director, KIA, Department of Lands and Environment
John Roesch, Senior Hope Bay Project Officer, KIA, Department of Lands and Environment