BACK RIVER GOLD MINE PROJECT
WRMP, WMP, ICRP, & PRWP:
COMMENT RESPONSES

DATE

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SIGNATURE PAGE

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WRMP, WMP, ICRP, PRWP:

RESPONSES TO REVIEW COMMENTS

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CONTENTS

1. CIRNAC

B2Gold Nunavut acknowledges comments from Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)/Relations Couronne-Autochtones et Affaires du Nord Canada (RCAANC) and has provided the requested information in the following sections.

1.1 CIRNAC #1 WASTE ROCK QUANTITIES AND STORAGE CAPACITY

CIRNAC Comment
The modification request proposes changing the size of pits and waste rock storage areas as well as the segregation criteria for potentially acid generating (PAG) and non-PAG (NPAG) waste rock. It is difficult to follow how the quantities of material are changing in order to confirm all material is accounted for. The proposed modification to PAG-NPAG segregation criteria will change the tonnage of PAG material, but since the total tonnage is also changing, it is difficult to distinguish the influence of each change.

The increase in tonnage of waste rock predicted between the 2022 and 2026 versions of the Waste Rock Management Plan is 5% (from 99.9 to 104.7 Mt), yet Table 3 of the Modifications and Management Plan Memo update indicates the total open pit footprints will increase by 42%. Though the pit footprints and mass of waste rock generated are not linearly related, the mismatch between the increases is surprising.

The Waste Rock Management Plan does not report quantities of waste rock for the Echo pit, instead referring to an annual report. It would be helpful to have all the information on waste rock quantities in the plan to make it possible to compare the totals of quantities produced and predicted for all pits with total capacity available in the waste rock storage areas (WRSAs).

The small volumes of waste rock from underground operations is also not clearly explained. The mine plan Gantt chart illustrated in Figure 3.5-1 of the Interim Closure and Reclamation Plan (ICRP) indicates that WRSAs will be completed concurrently with the open pits and will not be used for the last 5 years of operations when mining is only underground. This fits with the description in Section 4.4.1 stating there will be a net shortage of backfill material for the underground mines. However, blasted material generally does not fit back into the volume it initially occupied.

Recommendation (R-01): CIRNAC recommends that B2Gold:

a. Present a table or tables outlining the changes to the waste rock quantities and storage capacity, similar to Tables 2 and 3 in the Modification and Management Plan Updates Memo. Include pit volumes, quantities of PAG and NPAG already produced and predicted, and WRSA capacities; and

b. Discuss the bulking factor used for the rock from underground mines, and volumes of waste rock disposed underground in relation to volume of stopes.

B2Gold Response
B2Gold Nunavut acknowledges the comment and has provided below the information requested:

a. Summary tables of key open pit and waste rock information between the Waste Rock Management Plan (WRMP; April 2022) and WRMP (June 2026):
   - Table 1 summarizes open pit volumes;
   - Table 2 summarizes waste rock storage area maximum capacities; and
   - Table 3 summarizes open pit PAG and NPAG waste rock volumes that have been produced and are predicted to be produced.

b. The bulking factor assumed for waste rock from the underground mines is 30%. A total of approximately 0.6 Mt of PAG waste rock will be generated from underground development (WRMP, Section 5.1). Of this total volume, it is estimated that approximately 85% of waste rock will be stored in mined-out underground workings. The remaining waste rock from undergrounds will be stored in WRSAs, which have sufficient capacity for this material.

Table 1: Open Pit Volume Summary Between 2022 and 2026 Waste Rock Management Plans

Open Pit	Estimated Volume (Mm^3)	
	WRMP (April 2022)	WRMP (June 2026)
Echo	2.5	3.2
Umwelt	5.8	11.4
Llama	11.3	11.6
Goose Main	17.3	20.1

Table 2: Waste Rock Storage Area Maximum Capacity Summary Between 2022 and 2026 Waste Rock Management Plans

WRSA	Maximum Capacity (Mt)	
	WRMP (April 2022)	WRMP (June 2026)
Umwelt WRSA	15.0	23.2
Umwelt Overflow WRSA	~	4.4
Llama WRSA	31.0	42.1
Echo WRSA*	8.3	8.2
Goose Main WRSA	45.7	52.4

Notes: *Echo WRSA values included in Goose Main WRSA.

Table 3: Waste Rock Volume Summary Between 2022 and 2026 Waste Rock Management Plans

Open Pit Source	Material Type	Material Location	WRMP (April 2022)					WRMP (June 2026)				
			Quantity (Mt)			Distribution (%*)		Quantity (Mt)			Distribution (%*)	
			PAG	NPAG	OVB	PAG	NPAG	PAG	NPAG	OVB	PAG	NPAG
Echo	Produced	Echo WRSA / Overburden Stockpile	~	~	~	~	~	4.1	0.3	0.3	93%	7%
Umwelt	Produced	Umwelt WRSA / Overburden Stockpile	~	~	~	~	~	3.3	0.1	1.5	97%	3%
Umwelt	Predicted	Open Pit	7.3	6.9	1.2	52%	48%	9.0	13.6	0.1	40%	60%
Llama	Predicted	Open Pit	14.9	14.2	1.3	51%	49%	14.1	15.1	1.3	48%	52%
Goose Main	Predicted	Open Pit	8.2	35.1	4.0	19%	81%	6.5	38.6	3.9	14%	86%
Total			**30.4**	**56.2**	**6.5**	**35%**	**65%**	**37.0**	**67.7**	**7.1**	**35%**	**65%**

Notes: * Distribution does not include overburden (OVB), which is NPAG.

1.2 CIRNAC #2 UPDATING SEGREGATION CRITERIA FOR PAG ROCK

CIRNAC Comment

Segregation criteria developed in 2017 have been used to separate PAG waste rock from NPAG rock. The initial criteria for neutralization potential ratio (NPR) and total sulphur (S) concentration were developed based on static tests where neutralization potential was determined using the Sobek leaching procedure and kinetic humidity cell tests lasting up to 200 weeks. They are:

- NPAG: NPR >=3 OR total S < 0.15 wt%
- PAG: NPR <3 AND total S > 0.15 wt%

More data are now available, since certain humidity cell tests were continued more than 400 weeks and the modified Sobek method is being used to determine NP in the NPR. The new data shows that the initial criteria are overly conservative for waste rock from the Umwelt and Goose deposits, but not sufficiently conservative for waste rock from the Llama deposit. Specifically, PAG and NPAG at the Umwelt, Goose and George Deposits could be accurately separated using lower criteria:

- NPAG: NPR >=2 or total S <=0.08 wt%
- PAG: NPR <2 and total S > 0.08 wt%

However, for waste rock from the Llama deposit, samples classified as NPAG using the initial criteria have generated acid runoff.

The Waste Rock Management Plan proposes using two sets of PAG-NPAG segregation criteria; the initial criteria (NPR of 3 and total S at 0.15%) for the Llama and Echo deposits and a second new criteria (NPR of 2 and total S at 0.08%) for the Umwelt and Goose deposits. The NPAG/PAG Segregation Criteria Update Memo states "Verification of Llama waste rock geochemical behaviour with additional static and kinetic testing and/or deposit specific characteristics for the Llama deposit would be appropriate to inform if Llama waste rock has different characteristics to the other deposits that may be affecting the ABA testing results and/or the geochemical evolution during the kinetic testing."

CIRNAC notes that though further testing of Llama waste rock may be appropriate, there is sufficient data to warrant starting to use higher criteria for PAG-NPAG segregation at this deposit in the interim.

Recommendation: (R-02) CIRNAC recommends that B2Gold:

a. Propose PAG-NPAG segregation criteria for rock from the Llama deposit that would not misclassify PAG waste rock; and
b. Integrate proposed criteria in the Waste Rock Management Plan.

B2Gold Response

B2Gold Nunavut acknowledges the comments and will present the requested information in the next iteration of the Waste Rock Management Plan.

1.3 CIRNAC #3 METAL LEACHING WASTE ROCK

CIRNAC Comment
Section 5.3 of the Waste Rock Management Plan states that there is potential for metal leaching (ML) from NPAG waste rock, principally of aluminum and arsenic. The Plan includes some information on how this concern will be managed but there are insufficient details.

Section 7.1.4 of the Plan describes using shake flask extraction tests on a subset of NPAG material to confirm its ML-potential. Specifications on the size of the subset and frequency of testing were not found. There is also uncertainty in how the results are used because the Plan states "Materials classified as NPAG (Table 5.3-1 and Table 5.3-2) are suitable for placement anywhere within the WRSAs [waste rock storage areas] and will be the only material used for WRSA cover and construction purposes." And then later adds "Material with a high-ML potential will also not be used for WRSA cover material."

In order to avoid potential metal leaching from WRSAs and infrastructure constructed with NPAG material, clear testing and rock segregation procedures should be described in the Waste Rock Management Plan and put in place. This comment echoes concerns brought up in CIRNAC's last two annual report reviews.

Recommendation: (R-03) CIRNAC recommends that B2Gold update the Waste Rock Management Plan to:

a. Specify which subset of rock classified as NPAG will be tested for metal leaching potential;

b. Clarify that NPAG material with high ML-potential is not suitable for placement anywhere, specifically not for construction purposes or WRSA cover material.

B2Gold Response
B2Gold Nunavut acknowledges the comments and will provide clarification in the next iteration of the Waste Rock Management Plan.

1.4 CIRNAC #4 RECLAMATION OF WASTE ROCK STORAGE AREAS

CIRNAC Comment
The WRSA closure concept relies on permafrost aggradation preventing acid rock drainage (ARD) from developing. The Waste Rock Management Plan discusses thermal modelling in Section 5.6, referring to calculations made in 2017. In those models, the active layer thickness was expected to be less than the 5 m proposed NPAG cover thickness. It is not clear how applicable the 2017 models are to the WRSAs proposed in this modification that are larger and in some cases higher than the WRSAs initially planned. There is no indication in Section 4.5 that inert, non-hazardous solid waste will be landfilled within the WRSAs, as described in Section 4.8.1. This should be included in the description of WRSA as it might have an incidence on their design and the runoff quality.

Recommendation: (R-04) CIRNAC recommends that B2Gold update the ICRP to include:

a. References to thermal modelling that supports the aggradation of permafrost into the WRSAs and predicts the proposed 5 m thick NPAG cover layer will be greater than the active layer thickness; and

b. Include landfilling of inert demolition debris in the description of the WRSAs at closure.

B2Gold Response

a. The ICRP will be updated to include references to supporting thermal modelling as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package. Section 5.6 of the Waste Rock Management Plan references and describes the summary findings of the initial (2017) thermal analysis of the WRSA's, noting that freezeback was predicted to be rapid (2.5 to 5 years) and a climate change projection was incorporated into validating long-term performance. Section 5.6 of the Plan also states: "The results of this analysis will be confirmed and refined during Operations and Closure of the Project. As additional site-specific data is collected, this information will be used to further enhance or modify the closure of WRSAs, associated water treatment, and closure monitoring". The Goose Mine has recently (2025) commenced operations and the collection of site-specific data during construction of WRSA's; however, insufficient data has been collected to this early stage in project operations to warrant update of the thermal model on this basis. The currently proposed changes to the configuration of WRSA's are not expected to result in a meaningful change to the findings of the initial thermal model as freezeback and long-term performance are largely based on climate such that update of the thermal model is not considered warranted on this basis. B2Gold acknowledges that climate change science has advanced since 2017, resulting in updated climate projections that may be notably different than those applied in 2017, and on this basis intends to conduct a preliminary review of the potential effects on closure planning of changes in the configuration of WRSA's and in climate change predictions since 2017. If this review finds that it is necessary for closure planning purposes to update the thermal model, B2Gold will proceed with an update. The findings of the preliminary review will be included in the 2026 Annual Report to the NWB along with a schedule for further work, if necessary. The ICRP would be updated, as necessary, in future to incorporate the findings of updated thermal modelling.

b. The ICRP will be updated to include reference to closure landfills incorporated into or associated with WRSA's as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package. The specific locations and designs for closure landfills containing inert demolition debris are a future closure design project, following from approval of the general approach that closure landfill(s) can be incorporated into or associated with WRSA's to consolidate areas of disturbance. This approach to closure landfills does not compromise plans to construct and cover WRSA's progressively through operations as a means of facilitating freezeback of PAG materials. Once the currently proposed configurations and scheduling of WRSA's is resolved through approval of the NWB, B2Gold will continue to advance planning and design for closure landfills. This planning work will be a position to work with the actual constructed camp and surface facilities. B2Gold anticipates that a preliminary evaluation of locations and designs for closure landfills will be completed in 2027 and the finding will be provided to the NWB in the 2027 Annual Report.

1.5 CIRNAC #5 CONTINGENCIES FOR OPEN PIT CLOSURE

CIRNAC Comment

The contingencies discussed for open pit closure in Section 4.3.9 of the ICRP include alternatives for water not suitable for discharge as well as an entirely different possibility: "As a contingency for pit flooding, B2Gold Nunavut may consider the closure of any TF by placing a 5-m cover of NPAG waste rock and overburden material over the tailings-filled open pit".

Recommendation: (R-05) CIRNAC recommends that B2Gold:

a. Confirm when the decision to place a 5-metre cover of NPAG waste rock and overburden material over a tailings-filled open pit instead of flooding of a specific open pit will be made; and

b. Confirm that for each specific open pit, where the NPAG waste rock option is proposed to be implemented, there will be sufficient available NPAG material to achieve the 5-metre cover.

B2Gold Response

Closure of an open pit with an NPAG rock cover is possible if the TF is completely filled (i.e., to surface) with tailings or waste rock. In the currently proposed Management Plans, Echo Open Pit is the only TF that is currently planned to be completely filled with tailings and, resultingly, closed with a rock cover, which will be the Goose Main WRSA. The Llama and Umwelt TF's are planned to be partially filled with tailings and, resultingly, closed with a water cover. It is possible that future closure planning or operational optimizations may find that Llama and/or Umwelt TF should be completely filled and closed with a rock cover, in which case approvals would be requested of the NWB, possibly through a modification or an update of the ICRP. The approval requests would demonstrate that adequate NPAG rock is available to complete the closure covers. The ICRP will be updated to clarify, as stated above, that current closure planning in this regard aligns with approved Management Plans as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

1.6 CIRNAC #6 TEMPORARY WASTE ROCK STOCKPILES

CIRNAC Comment

As noted in Section 4.5.1.5 of the ICRP, "The Temporary NPAG Stockpile and Temporary Underground PAG Stockpile will temporarily store NPAG and PAG materials, respectively during the Operations Phase. These stockpiles will both be located north of the Umwelt Overflow WRSA and will be used to temporarily manage waste rock until this material can be either placed in a permanent WRSA or placed underground. The Temporary NPAG Stockpile and Temporary Underground PAG Stockpile are expected to reach its design capacity in Year 4 and Year 8, respectively".

The use of temporary waste rock stockpiles will involve double-handling, which typically results in increased operational costs and additional natural terrain disturbances.

Recommendation: (R-06) CIRNAC recommends that B2Gold provide a more detailed explanation regarding the purpose and need for these temporary waste rock stockpiles.

B2Gold Response
B2Gold Nunavut acknowledges the comment and is providing the requested information below.

- B2Gold notes that the concept of temporary storage of waste rock was part of the scope of the Back River Project approved by the NIRB and is a typical practice in mining operations. The temporary NPAG stockpile is required during periods when there is surplus NPAG material that is not needed at the time of mining but will be required in the future. These materials will be used for various purposes, including but not limited to civil projects such as berms, dikes, roads, pads, and reclamation activities such as waste rock storage area (WRSA) capping. The stockpiled volume is minimal compared to the overall waste volume; therefore, the associated rehandling cost will also be minimal and will be included in the activity cost.

- The temporary underground PAG stockpile is required to store waste material from underground that will later be hauled back underground for use as backfill materials. The associated rehandling cost is already included in the cost estimate. B2Gold Nunavut notes that temporary stockpiles of PAG and NPAG will be on relatively stable and impermeable ground with appropriate setbacks from natural waterbodies. B2Gold Nunavut will monitor surface water/runoff and seepage for evidence of ARD/ML to continuously assess environmental risks.

1.7 CIRNAC #7 SALINE WATER MANAGEMENT

CIRNAC Comment (New) & Request
Until Goose Open Pit is completed, the salt water pond (SWP) will be used to store saline water and pond volumes are proposed to be managed by treating water with reverse osmosis (RO). The SWP salinity would increase over time since it is the proposed disposal location for the RO brine. SWP reclamation described in the Water Management Plan includes removing sediment from the pond bottom. The Saline Water Management Plan does not provide enough detail to confirm that proposed measures will adequately manage saline groundwater encountered during mining.

Recommendation: (R-07) CIRNAC recommends that B2Gold:

a. Compare volumes of saline water generated with the capacity of the SWP over time;

b. Describe the water quality in the SWP and how it evolves over time;

c. Discuss how increasing salinity in the SWP will impact reverse osmosis treatment of water, and if it will change the proportion of brine generated; and

d. Explain why removal of SWP sediment at closure is not included in the ICRP.

B2Gold Response
B2Gold Nunavut acknowledges the comments and is providing the responses below.

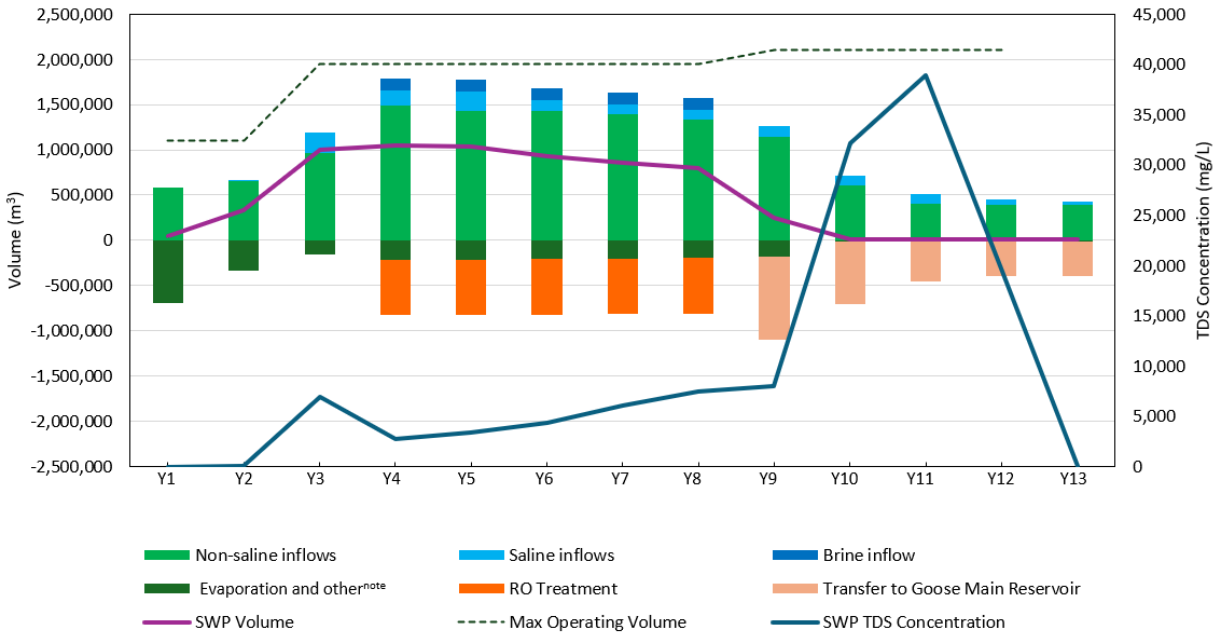
a. Figure 1 presents the annual inflows and outflows to the Saline Water Pond (SWP), together with the annual average total dissolved solids (TDS) concentration, which is used as an indicator of

salinity. The SWP is predicted to reach its maximum volume in Year 4 (2028), at which point reverse osmosis (RO) treatment is initiated. Prior to Year 9 (2033), RO treatment is the only managed outflow from the SWP (excluding evaporation), resulting in a gradual reduction in pond volume over time. Beginning in Year 9 (2033), Goose Main Reservoir becomes available for saline water storage and water from the SWP is transferred to the reservoir, allowing the SWP to be maintained at a low operating volume. Saline groundwater inflows are predicted to represent approximately 2% to 21% of total inflows on an annual basis to the SWP, while returned brine (RO waste effluent) represents approximately 8% of total inflows on an annual basis. Although the SWP serves as the primary repository for saline groundwater during operations, most of the water stored in the pond is derived from non-saline sources (runoff, snowmelt, and direct precipitation).

b. TDS concentrations are predicted to increase during the initial years of saline water storage prior to commencement of RO treatment (Figure 1). Following implementation of RO treatment, TDS concentrations decrease as saline water is removed from the system, followed by a gradual increase associated with the return of concentrated RO brine to the pond. After transfers to Goose Main Reservoir begin in Year 9 (2033), annual average TDS concentrations increase for the next two years as the SWP is maintained at a low volume while continuing to receive saline groundwater. During this period, TDS concentrations are more representative of the chemistry of the saline groundwater inflows because freshwater inflows occur primarily during the freshet period, whereas groundwater inflows occur throughout the year. TDS concentrations decrease in the last two years of operations (2036 to 2037) as the groundwater inflows to the SWP decrease. Figure 1 shows that the predicted volume of saline water generated during operations remains within the available storage capacity of the SWP and that implementation of RO treatment, followed by transfer of water to Goose Main Reservoir, provides sufficient capacity to manage saline water throughout the operating period.

c. B2Gold is currently working with the water treatment vendor to further develop the reverse osmosis (RO) treatment plant design. As part of this work, sensitivity analyses are being completed to evaluate how increasing salinity within the Saline Water Pond (SWP) may affect treatment performance, including RO recovery rates and the proportion of brine generated. The assessment will also evaluate treatment requirements across a range of anticipated influent salinities. The findings of this assessment will be incorporated into the final design and supporting technical documentation.

d. The ICRP will be updated in the next iteration to include references for removal of SWP sediment at closure as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.



Notes: Include Umwelt Lake dewatering during Y1 and Y2.

Figure 1: Inflow and outflow volumes to the Saline Water Pond (SWP) and annual average TDS concentrations in SWP

1.8 CIRNAC #8 USE OF GOOSE PIT AS A RESERVOIR

CIRNAC Comment

The proposal to use Goose Main Reservoir as the primary saline water repository means its successful reclamation at closure becomes critical. The ICRP does not provide sufficient detail on meromictic conditions to provide confidence in this proposed methodology. CIRNAC has concerns about long-term environmental risks if stratification fails. The Water Balance and Load Model predict a median modelled chloride concentration at the outflow of the Goose Main Reservoir right at long-term Canadian Council of Ministers of the Environment (CCME) criteria for the protection of aquatic life (120 mg/L) the first year of post-closure. The Water Balance and Load Model assume meromictic conditions in the pit so any difficulties would increase chloride concentrations in the outflow. This is far from a conservative assumption since it predicts a 50% probability the chloride criteria will be exceeded in the Goose Main Reservoir.

Recommendation: (R-08) CIRNAC recommends that B2Gold:

a. Discuss the hydrogeological and geothermal conditions in Goose Main Reservoir to confirm that storage of saline water will not negatively impact permafrost and groundwater;

b. Present the volume and water quality of the saline water to be stored in the reservoir, along with the depth to which the mined-out pit will be filled with saline water and the thickness of the overlying freshwater layer; and

c. Describe modelling of meromictic conditions, explain why chloride concentrations at the outflow of Goose reservoir are expected to be elevated despite these conditions and discuss the feasibility of treating the outflow of Goose reservoir if necessary.

B2Gold Response

B2Gold Nunavut acknowledges the comments and is providing below, the information requested.

a. B2Gold Nunavut confirms detailed hydrogeological assessments, including the assessment of geothermal conditions, were completed as part of Final Environmental Impact Statement (Sabina 2015; Appendix V2-7A) and the Type A Water Licence Application (Sabina 2017; Appendix E-2). B2Gold highlights that saline water storage in Goose Main Reservoir was previously approved under the Type A Water Licence (Water Management Plan [April 2022]). The ICRP will be updated to consider potential hydrogeological assessments where appropriate in advance of Closure as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

b. Following completion of mining at the Goose Main Pit, Goose Main Reservoir becomes the primary repository for saline water generated on site. Beginning in Year 9 (2033), saline water from the Goose Underground and Echo Underground workings, as well as saline water transferred from the Saline Water Pond (SWP), will be directed to the Goose Main Reservoir. During operations, saline water represents approximately 80 to 90% of the total reservoir volume.

c. At closure, the Goose Main diversion berms and Rascal Diversion berms are breached, increasing freshwater inflows to the reservoir. As a result, the freshwater cap rapidly increases, reaching approximately 45 m (Figure 2) after the first year of the diversion being breached. Over the same period, the saline water fraction decreases to approximately 36% of the reservoir volume and continues to decline as the reservoir fills. At full reservoir capacity, saline water is predicted to represent approximately 16% of the total reservoir volume. The evolution of saline water layer and total reservoir volume and the freshwater cap thickness is presented in Figure 2. The water quality predictions presented in the Water and Load Balance Model (BGC, June 25, 2026) assume that individual reservoirs and ponds are fully mixed. Under this approach, constituent loads are distributed throughout the entire reservoir volume and do not explicitly account for the lower concentrations that would be expected within an overlying freshwater layer if density stratification develops (i.e., meromictic conditions). As a result, the modelled reservoir concentrations do not reflect the potential isolation of the deeper saline layer and therefore represent a conservative estimate of overall reservoir water quality. Figure 3 compares the modelled total dissolved solids (TDS) concentrations in Goose Main Reservoir under the fully mixed assumption with preliminary estimates of concentrations in the saline layer. Saline layer concentrations were estimated separately by tracking saline inflows within an independent model node, providing an upper-bound estimate of saline water chemistry. Some mixing between the saline and freshwater layers would be expected, particularly during the early stages of pit filling when saline water comprises most of the reservoir volume.

Treatment of Goose Reservoir water prior to discharge remains a contingency measure within the closure plan. In the Water and Load Balance Model (BGC, June 25, 2026), treatment requirements were evaluated based on predicted discharge quality relative to applicable MDMER parameters. Chloride is not an MDMER-regulated parameter and was therefore not used as a treatment trigger in the model. However, this does not preclude treatment of Goose Reservoir outflows should monitoring indicate that treatment is required to achieve closure objectives or protect downstream aquatic life. Table 5-3 of the Water and Load Balance Report identifies chloride as one of the potential constituents subject to treatment, and the Water Management Plan states that treatment of Goose Main Reservoir water may be implemented during closure and post-closure, if required.

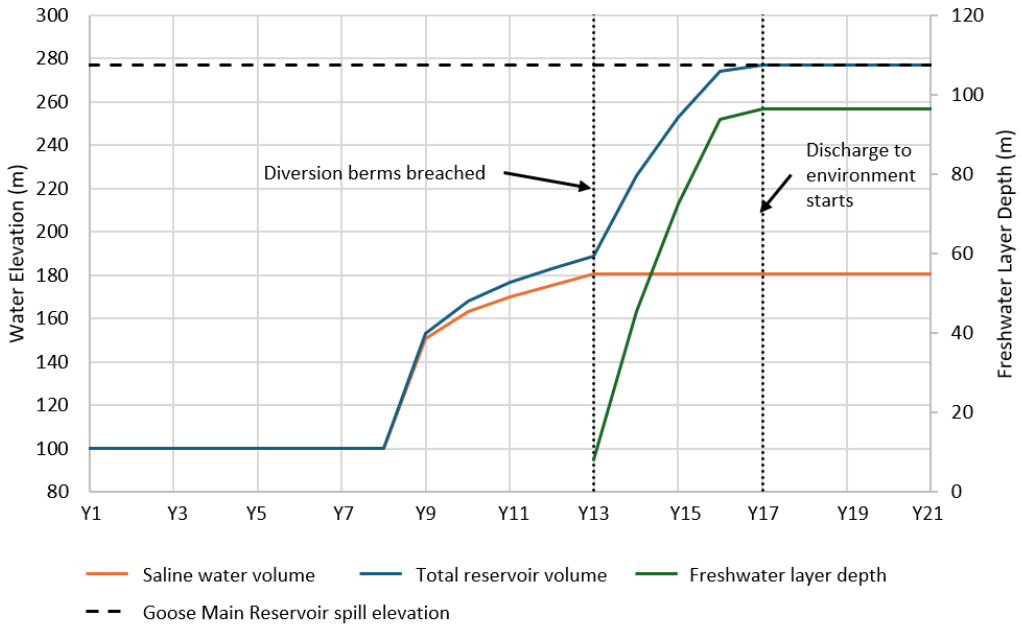


Figure 2 Predicted total reservoir water elevation, saline water layer elevation, and freshwater layer depth in Goose Main Reservoir. Saline water layer elevations were estimated assuming ideal meromictic conditions

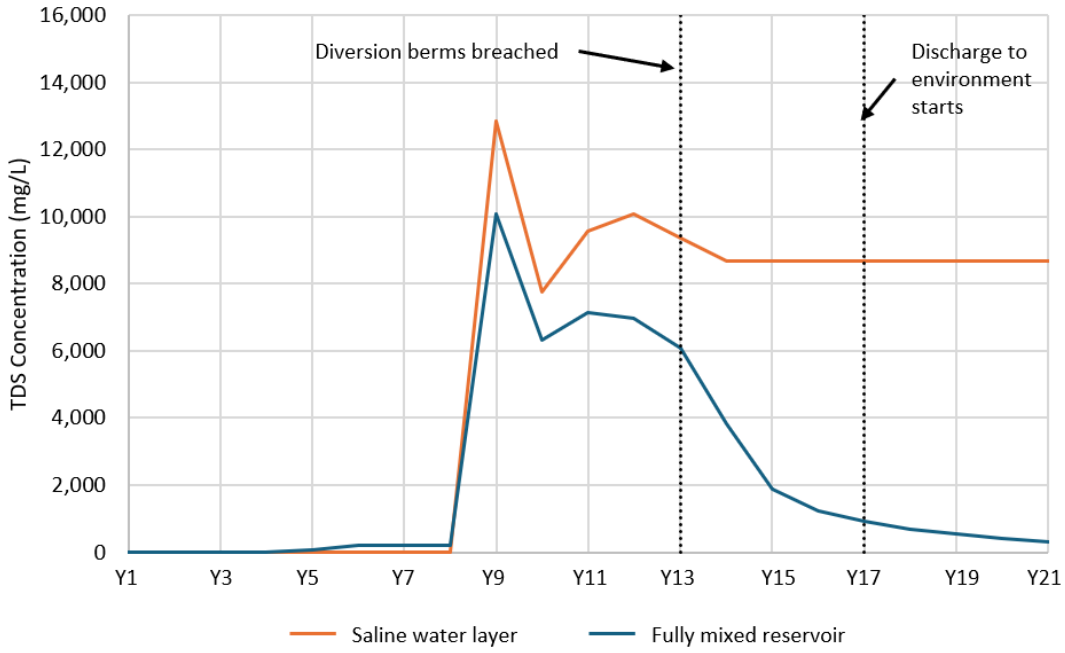


Figure 3 Goose Main Reservoir predicted concentrations of TDS in the saline water layer and in the reservoir under fully mixed conditions.

1.9 CIRNAC #9 PREDICTED GROUDNWATER INFLOWS

CIRNAC Comment

Predicted groundwater inflows have been updated in the Water Load and Balance Report. Two scenarios with different hydraulic conductivity profiles were used to calculate groundwater inflows in the 2022 report which resulted in lower (scenario #1) and higher (scenario #2) flows. For the 2026 report groundwater inflows were scaled to account for changes in mine plan, but the groundwater model was not recalculated. While the 2022 report and associated Water Management Plan used scenario #2 groundwater inflows as input to water load calculations on site, the 2026 report. The latter plan states "A sensitivity analysis of the Water and Load Balance Model was completed considering Scenario 2 groundwater inflows. The model sensitivity results showed that the proposed saline water

Model updates are essential to adapting mine management, but insufficient new data has been presented to justify working with the lower groundwater inflow scenario. Once the underground mines are developed and there is inflow data, the groundwater flow model can be updated and it might be possible to use less conservative assumptions. Since the Water Management Plan doesn't account for any saline water disposal until Year 9 of the mine plan, sufficient capacity to store saline groundwater flows is critical.

Recommendation: (R-09) CIRNAC recommends that B2Gold update the Water and Load Balance Report and the Water Management Plan to use model scenario #2 groundwater inflows.

B2Gold Response
B2Gold Nunavut acknowledges the comments and is working on the next iteration of the Water and Load Balance Model. Groundwater is being monitored and monitoring results will be used to update predictions once sufficient data have been collected. Results will be reflected in the next Water and Load Balance Model.

1.10 CIRNAC #10 ARD & ML TESTING OF TAILINGS AND TREATMENT SLUDGES

CIRNAC Comment
The Water and Load Balance Model calculate dissolved parameter concentrations and screens them against Metal and Diamond Mining Effluent Regulations (MDMER) discharge limits. MDMER limits are for total concentrations. Since total metal concentrations can be a significantly higher than dissolved concentrations when total suspended solids (TSS) are present, it is not clear how B2Gold concludes that metal concentrations will always remain below MDMER limits.

Recommendation: (R-10) CIRNAC recommends that B2Gold describe how they account for total metals when comparing model node concentrations to MDMER limits.

B2Gold Response
B2Gold Nunavut acknowledges the comments and is providing the information below. The Water and Load Balance Model (BGC, June 25, 2026) predicts dissolved constituent concentrations and was developed as a water management planning tool to support evaluation of site water quality, constituent loading, and long-term water management requirements. Specifically, the model is used to predict when water treatment may be required, the anticipated duration of treatment requirements, and the overall performance of the site water management system under operational and closure conditions. For screening purposes, predicted dissolved concentrations were compared to MDMER discharge limits to identify constituents that may require water treatment or additional management prior to discharge. Actual compliance with MDMER discharge criteria would be verified through effluent characterization and monitoring at the time of discharge.

1.11 CIRNAC #11 SOURCE TERMS IN WATER AND LOAD BALANCE MODEL FOR TEMPORARY STOCKPILES

CIRNAC Comment
The licence modification request includes the addition of two temporary waste rock stockpiles next to the Llama WRSA Pond, one for NPAG and the other from underground PAG that will be used as backfill. Table D-1 of the Water and Load Balance Report that lists input source term concentrations does not include terms for either of the temporary waste rock stockpiles.

The flow diagrams in Appendix B of the Water and Load Balance Model indicate that contact water from both temporary stockpiles will be routed to the primary pond and would therefore contribute to its load. Runoff from underground waste rock could contribute higher salinity than waste rock from open pits if it was mined in areas below permafrost. Considering contribution of all sources in the Water and Load Balance Report is important for more accurate predictions, which will help ensure site's water management strategy is adapted to future conditions.

Recommendation: (R-11) CIRNAC recommends that B2Gold:

a. Provide input source term concentrations for the NPAG and underground PAG temporary waste rock stockpiles; and

b. Describe how these terms were incorporated in the Water and Load Balance Model.

B2Gold Response

B2Gold Nunavut acknowledges the comments and is providing the responses below.

a. The input source-term concentrations for the Temporary NPAG Stockpile and the Temporary Underground PAG Stockpile are provided in Table 4.

b. The temporary stockpiles were incorporated into the Water and Load Balance Model (BGC, June 25, 2026) using the same loading methodology applied to the other waste rock facilities on site. Constituent loadings were estimated based on kinetic geochemical testing data, waste rock tonnage and the proportion of each lithology present within the stockpile. The resulting source-term concentrations were calculated from these loads and the associated contact water volumes. However, unlike the permanent waste rock facilities, concentrations for the temporary stockpiles were not further constrained using PHREEQC-derived upper-bound concentrations. At the time of modelling, the detailed geochemical composition of the waste rock that will be placed in the temporary stockpiles was not available. As a result, surrogate source terms were selected from existing waste rock source terms developed for the site.

   The Temporary NPAG Stockpile source term was represented using the Umwelt Waste Rock NPAG source term. The Temporary NPAG Stockpile is active during the period when the Umwelt and Llama pits are being developed. Because Umwelt is the first pit developed during this period, the Umwelt NPAG source term was considered representative of the material likely to be placed in the stockpile.

   The Temporary Underground PAG Stockpile source term was represented using the Llama Waste Rock PAG source term. The Llama PAG source term produces higher concentrations for several of the major constituents that drive waste rock water quality and was therefore considered a conservative representation of the PAG material temporarily stored.

Table 4 Model Input Source Term Concentrations for the Temporary UG PAG and NPAG Stockpiles

Constituent[a]	Unit	Temporary UG PAG Stockpile - Max[b]	Temporary NPAG Stockpile - Max[b]
Alkalinity	mg/L	0.092	62
Aluminum	mg/L	0.39	0.39
Ammonia	mg-N/L	0	0
Antimony	mg/L	0.0025	0.0025
Arsenic	mg/L	0.22	0.22
Barium	mg/L	0.0027	0.022

Constituent[a]	Unit	Temporary UG PAG Stockpile - Max[b]	Temporary NPAG Stockpile - Max[b]
Beryllium	mg/L	0.0012	0.0012
Bismuth	mg/L	0.15	0.00050
Boron	mg/L	3.6	3.6
Cadmium	mg/L	0.00010	0.00010
Calcium	mg/L	73	73
Chloride	mg/L	198	198
Chromium	mg/L	0.015	0.015
Cobalt	mg/L	0.018	0.018
Copper	mg/L	0.011	0.011
Cyanate	mg/L	0	0
Fluoride	mg/L	0.050	0.050
Free Cyanide	mg/L	0	0
Hardness	mg/L	3803	614
Iron	mg/L	0.42	0.42
Lead	mg/L	0.018	0.018
Lithium	mg/L	2.0	2.0
Magnesium	mg/L	11	11
Manganese	mg/L	0.47	0.47
Mercury	mg/L	0.0000050	0.0000050
Molybdenum	mg/L	0.0051	0.0052
Nickel	mg/L	0.058	0.058
Nitrate	mg-N/L	8.5	1.7
Nitrite	mg-N/L	23	0.42
Orthophosphate	mg-P/L	0	0
Phosphate	mg-P/L	0	0
Phosphorus	mg/L	0.63	0.17
Potassium	mg/L	237	237
Selenium	mg/L	0.0020	0.0020
Silicon	mg/L	38	40
Silver	mg/L	0.000040	0.000040
Sodium	mg/L	950	950
Strontium	mg/L	9.2	9.2
Sulphate	mg/L	2244	2244
TDS	mg/L	0	0
Tellurium	mg/L	0.0024	0.0020
Thallium	mg/L	0.00044	0.00044
Thiocyanate	mg/L	0	0
Thorium	mg/L	0.0014	0.00019
Tin	mg/L	0.018	0.018

Constituent[a]	Unit	Temporary UG PAG Stockpile - Max[b]	Temporary NPAG Stockpile - Max[b]
Titanium	mg/L	0.074	0.019
TOC	mg/L	0	0
Total Cyanide	mg/L	0	0
TSS	mg/L	0	0
Uranium	mg/L	0.045	0.045
Vanadium	mg/L	0.27	0.27
WAD Cyanide	mg/L	0	0
Zinc	mg/L	0.016	0.016
Zirconium	mg/L	0.015	0.0031

Notes: (a) Metals are dissolved concentrations. (b) Source terms are calculated based on "live" amounts of material in the piles (i.e., exposed), therefore they have changing values over the model period. Maximum values for lifetime of stockpile where they are active are included. PAG = potentially acid generating; NAG = net acid generation WR = waste rock; UG = underground; TDS = total dissolved solids; TOC = total organic carbon; TSS = total suspended solids; WAD = weak acid dissociable; mg/L = milligrams per litre; mg-N/L = milligrams of nitrogen per litre; mg-P/L = milligrams of phosphorus per litre.

1.12 CIRNAC #12 WATER MANAGEMENT IN THE ICRP

CIRNAC Comment

Though the ICRP is "interim" and the engineering design continues to advance, the plan lacks clarity and consistency in some key areas, particularly the handling of water (quality, routing, treatment) and mine waste (tailings, waste rock). Water quality and the requirement for water treatment is a major consideration in mine reclamation. Tables presenting closure objectives and criteria lack consistency with the text and omit certain key details which could lead to an incorrect understanding of what is envisioned.

Descriptions of pit flooding in Table 4.3-3 indicates Umwelt Pit will be partially filled with saline water from the saline water pond (SWP); however, the main body of the text in Section 4.3.4.1 only presents this approach for the Goose Main Pit. In Table 4.3-3, only Llama Pit is mentioned with respect to receiving tailings; however; Umwelt Pit will also be closed in this same manner.

In Table 4.3-3, the statement that "all pits will be passively flooded" is inconsistent as Echo Pit will not be closed in this way according to the main body of text. Description of underground flooding with saline water in Table 4.4-2 only presents details for Umwelt while the main text in Section 4.4.1 indicates all underground workings, with the exception of Echo, would be flooded as described.

The water treatment activities described in Section 4.9.1.1 are to occur during operations, so it is not clear what water treatment is planned during active and passive closure, nor how the 3 million m3 volume used in the reclamation cost estimate was calculated.

The inconsistencies in the document make it difficult to understand planned activities for each component.

Recommendation: (R-12) CIRNAC recommends that B2Gold update the ICRP to be clear and consistent when presenting key closure aspects and summaries (e.g., refer readers to Section 4.9 in earlier sections when presenting water treatment so readers know additional detail is available; and summarize closure approaches consistently in tables and across sections).

B2Gold Response

The ICRP will be updated to clarify that current closure planning aligns with approved Management Plans and to address the inconsistencies identified above and others that may be identified through internal review as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

1.13 CIRNAC#13 LANDFILLS

CIRNAC Comment

As noted in Section 4.6.5 of the ICRP, B2Gold is proposing to dispose of a considerable amount and volume of equipment, machinery, and building infrastructure during the closure period into one or more future on-site landfills, contained within the WRSAs.

Little information is provided on the nature, size, and operational practices of the future onsite landfill(s) and how their performance might influence the anticipated closure performance of the WRSAs. It is therefore not clear how the landfills in WRSAs will be able to receive demolition debris during closure since the mine plan Gantt chart presented in Figure 3.5-1 indicates the WRSAs will be completed by the middle of Year 9 and closure starts in Year 14. Table 4.8-1 also proposes "…non-hazardous debris will be disposed of in the on-site landfill or within the mined-out open pits". No discussion of landfilling of debris in mined-out pits was found in the text of Section 4.8.1 or elsewhere in the ICRP.

Recommendation: (R-13) CIRNAC recommends that B2Gold:

a. Provide more detailed information on the total number of anticipated onsite landfills to be developed and produce a strategy which limits and optimizes the total number of landfills actually required;

b. Describe how landfills will influence the closure performance (e.g., freezing in particular) of the WRSAs;

c. Explain how the landfills in WRSAs will be operated after the WRSAs are completed; and

d. Clarify whether mined-out open pits will be used to store non-hazardous debris and if so, include this description in the design descriptions of the open pits in Section 4.3.

B2Gold Response

The specific locations and designs for closure landfills containing inert demolition debris are a future closure design project, following from approval of the general approach that closure landfill(s) can be incorporated into or associated with WRSA's to consolidate areas of disturbance. This approach to closure landfills does not compromise plans to construct and cover WRSA's progressively through operations as a means of facilitating freezeback of PAG materials. Once the currently proposed configurations and scheduling of WRSA's is resolved through approval of the NWB, B2Gold will continue to advance planning and design for closure landfills. This planning work will be a position to work with the actual constructed camp and surface facilities. B2Gold anticipates that a preliminary evaluation of locations and designs for closure landfills will be completed in 2027 and the findings will be provided to the NWB in the 2027 Annual Report. The evaluation will consider the

number and locations of landfills, implications for closure of WRSA's, and use of open pits for waste disposal. The ICRP would be updated in future to incorporate specific designs as they are developed.

1.14 CIRNAC #14 POST-CLOSURE AND LONG-TERM MONITORING AND MAINTENANCE IN THE ICRP POST-CLOSURE

CIRNAC Comment

The ICRP touches on post-closure and long-term monitoring and maintenance but insufficient detail is presented to fully understand proposed activities. As noted in Section 4.3.8, "Water quality monitoring will occur at each open pit/TF [tailings facility] until water quality objectives are met, at which time these facilities would be allowed to overflow. It is anticipated that after five years in the Post-Closure Phase, monitoring would no longer be required.

The Closure and Post-Closure monitoring described above will determine the long-term maintenance that would be required for the Post-Closure Phase. B2Gold Nunavut notes that an allowance for long-term monitoring beyond the Post-Closure Phase has been included in the RLCE [reclamation liability cost estimate] (Appendix D)". Though the activities proposed in the cost estimate will be subject to change, they provide a good starting point.

Recommendation: (R-14) CIRNAC recommends that B2Gold:

a. Provide a rationale for anticipating that after five years into the Post-Closure Phase, monitoring would no longer be required; and

b. Update the ICRP to describe the activities and schedule for work during the post closure and long-term monitoring phases.

B2Gold Response

a. The Water and Load Balance Report (Appendix 3 to the June 2026 Water Management Plan) provides for water treatment (or potential for water treatment) through the active and passive closure periods (Project Years 14 through 20), after which time all water quality is predicted to meet closure criteria. The ICRP and closure cost estimate provides for water monitoring through the active and passive closure periods as well as annually for the first five years of the post-closure period (Project Years 21 through 25) followed by Project Years 27, 30, 35 and 45 (i.e., a 25-year post-closure monitoring period). The ICRP anticipates that 5-years of annual post-closure monitoring should be sufficient to demonstrate stable water quality consistent with predictions. Continued monitoring on a reduced schedule is provided for longer-term verification.

b. The ICRP will be updated to more clearly describe post-closure activities and schedule as per response (a) above as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

1.15 CIRNAC #15 LANDSCAPE AT CLOSURE

CIRNAC Comment

The ICRP does not include a site-wide closure criterion to address the final landscape at closure and how reclaimed areas fit in the existing landscape. Given the change in anticipated height of planned WRSAs, it will be important to evaluate proposed closure plans against well-defined criteria.

Recommendation: (R-14) CIRNAC recommends that B2Gold:

a. Provide a rationale for anticipating that after five years into the Post-Closure Phase, monitoring would no longer be required; and

b. Update the ICRP to describe the activities and schedule for work during the post-closure and long-term monitoring phases.

B2Gold Response

The approved closure objectives and criteria are part of the design basis for the Goose Mine. Consideration of new closure objectives/criteria may, as a result, have serious implications for mine design and operations that are underway. B2Gold acknowledges the comment but advises that the WRSA's have been acknowledged as permanent new features on the landscape. The proposed changes to the WRSA's intend to balance efficient mine operations that maximize value obtained from a public resource with approved development footprints that avoid ecologically sensitive areas or waterways. The proposed changes to the WRSA's are optimizations that do not change the accepted approach to WRSA's as permanent new features of the landscape and, for these reasons, B2Gold does not believe that the suggested new closure objective/criterion is warranted or should be pursued.

1.16 CIRNAC #16 REVEGETATION

CIRNAC Comment

Section 5.3 of the ICRP indicates "active revegetation of the Property during Closure is not planned due to the cold climate and established practices for mine closure in Nunavut (Sabina 2021)" but that select areas along the winter ice road may be scarified and seeded. Additionally, Section 5.3 suggests "a revegetation research program has been initiated by B2Gold Nunavut"; however, the extent of this research is essentially a literature review of reclamation practices and studies from other northern mine sites (Appendix C of the ICRP).

Section 1.3 of the 2026 Progressive Reclamation Work Plan presents two Project Certificate Terms and Conditions (TC) that state B2Gold is to develop a progressive revegetation program including the consideration of test plots, reseeding, and replanting of native plants, as necessary (TC 35) as well as revegetation strategies that support progressive reclamation and promote natural revegetation and recovery of disturbed areas (TC 36).

Appendix C of the ICRP and Appendix A of the Progressive Reclamation Work Plan present the results of the Reclamation and Revegetation Literature Review; however, no details on actual reclamation research (e.g., test plots, plant salvage, seed collection) are provided. A literature review is essential to the foundation of reclamation research but is not equivalent to an actual research program. It is understood that active

revegetation in cold climates can be challenging but it is not impossible. There is mention of B2Gold salvaging soil from the stripping of material as part of development of the Echo and Umwelt pits; however, no information is provided on the proposed end use of this material.

Recommendation: (R-16) CIRNAC recommends that B2Gold:

a. Provide additional details on plans to implement a reclamation research program to meet Project Certificate Terms and Conditions 35 and 36; and

b. Specify if/how the material stripped from the Echo and Umwelt pits might be used in future progressive reclamation or final reclamation activities.

B2Gold Response

a. The ICRP will be updated to more clearly describe reclamation research program as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

b. During construction B2Gold attempted to salvage the topsoil/organic layer when stripping overburden from Echo and Umwelt Open Pits; however, the topsoil/organic horizons were minimal to non-existent and were not salvageable separately from the overburden. The overburden in these areas primarily consists of unconsolidated material (primarily sandy loam). Therefore, material stripped from Echo and Umwelt pits was placed in overburden stockpile

2. ECCC

B2Gold Nunavut acknowledges comments from Environment and Climate Change Canada (ECCC) and has provided the requested information in the following sections.

2.1 ECCC #1 WASTE MANAGEMENT AND MONITORING

ECCC Comment #1

The modification proposes changes to the configuration and locations of the existing planned waste rock storage areas (WRSA) and includes the addition of a new waste rock storage area (Umwelt Overflow WRSA), two temporary waste rock stockpiles and the addition of three overburden stockpiles. The memo states that, "WRSA seepage and runoff will continue to be collected in perimeter berms and directed to collection and pumped to Primary Pond or the active Tailings Facility." The memo states that all monitoring will remain consistent with the currently approved Water Management. Figure A-01 provides an updated site layout that includes the proposed modifications but does not clearly depict all associated water management infrastructure for the proposed waste rock and overburden storage areas, nor does it indicate flow directions. Given the expansion of waste rock and overburden storage piles on the site, additional water management infrastructure may be required to collect and manage seepage and runoff associated with these areas.

Recommendation: (R-1) ECCC recommends the Proponent provide:

1. A description of any new water management infrastructure (e.g., ponds, sumps, collection ditches, diversions) associated with the proposed changes to waste rock storage areas and overburden storage areas.

2. A figure depicting the proposed water management infrastructure and flow direction for runoff and seepage from the associated waste rock storage areas and overburden stockpiles.

3. A list of any new monitoring stations, or modifications to existing monitoring stations, required as a result of the modification or justify why existing monitoring is sufficient

B2Gold Response

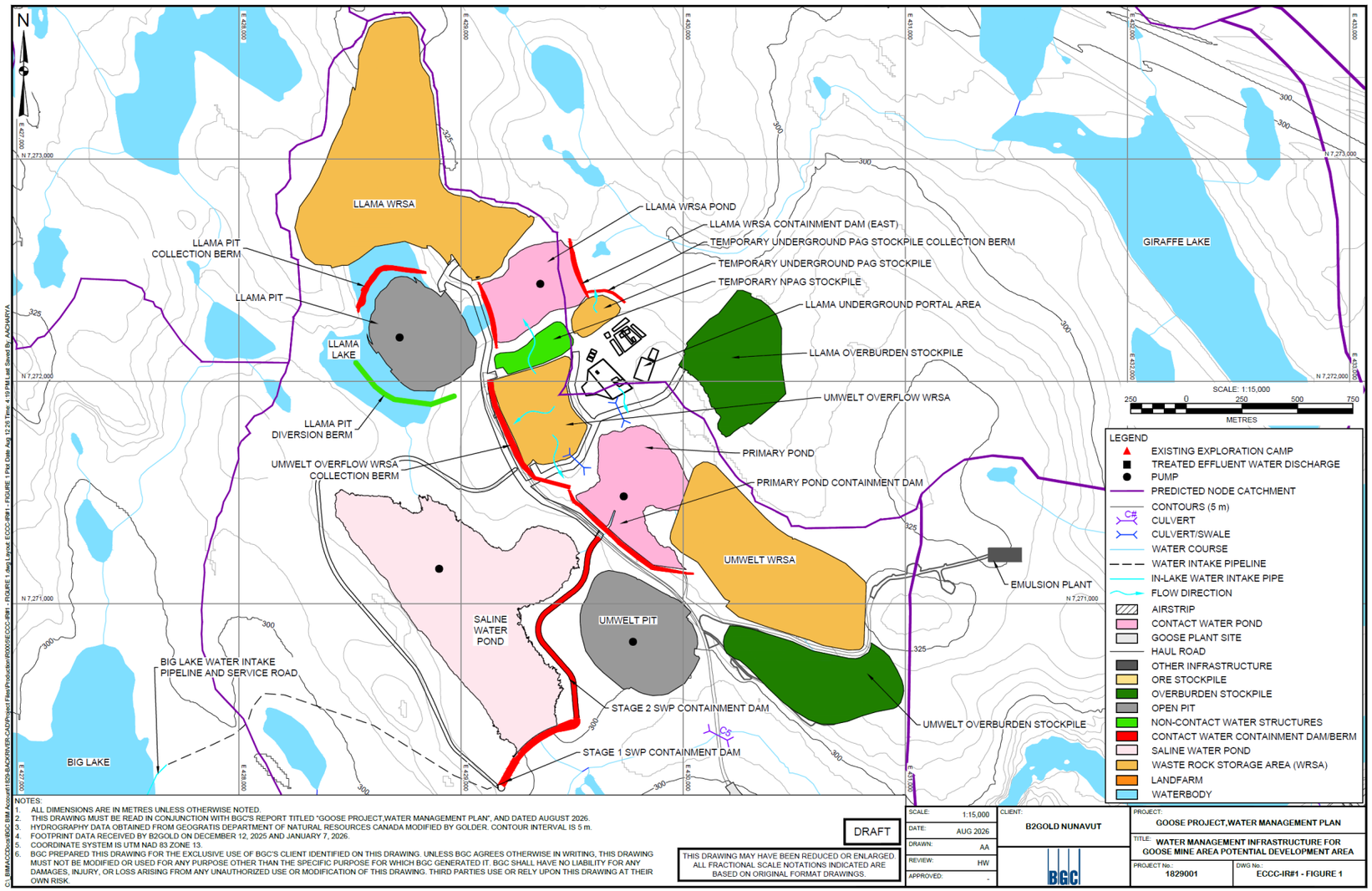
1. The newly proposed waste storage areas (Umwelt Overflow WRSA, Temporary NPAG Stockpile and the Temporary Underground PAG Stockpile) are located between the Primary Pond and the Llama Waste Rock Storage Area Pond. Based on topographic conditions in the area, runoff and seepage from the waste rock storage areas will naturally report to the Primary Pond and the Llama Waste Rock Storage Area Pond. As such, new ponds are not proposed. Collection ditches may be constructed around the Umwelt Overflow WRSA and the Temporary Underground PAG Stockpile to help conveying water to the ponds. Runoff generated from the Llama Underground Portal Area will be collected locally and either used in the Llama Underground operations or pumped to Primary Pond. Runoff generated from the platform areas associated with the Llama Underground development is expected to be suitable for discharge to the environment. Best management practices will be implemented as described in the Water Management Plan. Culverts or swale will use to convey water across the roads towards Primary Pond. Water will be discharged to the

environment only if it meets discharge limits. The design of the structures described above and shown in Figure 4 ECCC#1 is in progress and will be provided to NWB at least 60 days prior to construction in accordance with the Type A Water Licence (2AM-BRP1831 Amendment No. 1 Part D, Item 2). Please refer to the response to ECCC#3 for water management for the overburden stockpile areas.

2. Figure 4 shows the conceptual location and alignment of the proposed water management structures associated with the proposed changes to the waste rock storage areas.

3. Monitoring stations are within B2Gold compliance scope, and a comprehensive monitoring program is being conducted by B2Gold as per the Type A Water License 2AM-BRP1831 requirements (Amendment No.1).

Figure 4 Conceptual location and alignment of the proposed water management structures associated with the proposed changes to the waste rock storage area



2.2 ECCC #2 SCALING OF GROUDNWATER PREDICTIONS

ECCC Comment

The Water Management Plan states that, "for the purpose of the update of the water management plan presented herein, the predictions of groundwater inflows included in WSP Golder (2022) were scaled to reflect the updated mine schedule and depth of operating." The approach of "scaling" the previous modelled inflows to arrive at updated values is mentioned throughout the Water Management Plan, however, no details have been provided on the methodology that was used to "scale" the groundwater quality and quantity predictions. Appendix C to the Water and Load Balance provides new values for flow rates and predicted total dissolved solids concentrations as a result of the scaling, but it does not provide sufficient information on how these revised values were derived. For example, the proposed Llama underground change extends approximately 280 m deeper than previously planned, resulting in changes to flow rates and total dissolved solids (TDS) concentrations. However, no specifics on how these numbers were arrived at are provided, other than to state that they were scaled based on Umwelt Underground. Similarly, Umwelt underground is proposed to go slightly deeper, but TDS concentrations are lower than those presented in the original mine plan. The rationale for this decrease is not explained

Recommendation: ECCC recommends the Proponent provide a detailed description of the methodology, assumptions, and calculations used to scale the groundwater quantity and quality from WSP Golder (2022). Specifically, for each underground mine development area, describe the specific changes and assumptions that were applied that resulted in the updated groundwater flow rates and predicted water quality concentrations.

B2Gold Response

The methodology used to update groundwater inflow rates and associated total dissolved solids (TDS) concentrations for the current mine plan is described in Appendix C of the Water and Load Balance Report (BGC, June 25, 2026). Groundwater inflow predictions from WSP Golder (2022) were used as the basis for the update and scaled to reflect differences in mining depth and timing between the Sabina Mine Plan and the current mine plan. The WSP Golder groundwater model was not rerun; instead, groundwater inflow and water quality predictions were adjusted based on mine development elevations while retaining the hydrogeological assumptions from the WSP Golder analysis, including hydraulic conductivity and TDS-depth relationships. Groundwater inflow scaling was completed for both Scenario 1 and Scenario 2 considered by WSP Golder (2022).

For the open pits, mining depths are generally similar between the Sabina Mine Plan and the Current (2026) Mine Plan and, therefore, groundwater inflow and TDS predictions were assumed to remain unchanged for the Umwelt, Goose, and Echo pits. These three pits are expected to be fully within permafrost (BGC, June 25, 2026).

Llama Open Pit will occur in the footprint of Llama Lake, which is associated with taliks. The initial mining elevation is approximately 20 m higher than in the Sabina Mine Plan. Accordingly, groundwater inflow and TDS predictions for the upper portion of the pit, occurring in its first year of development, were based on WSP Golder Scenario 2b, which specifically evaluated the sensitivity of groundwater inflows to enhanced near-surface bedrock storage conditions within the Llama Pit. BGC acknowledges that this approach may under-

estimate inflows to Llama Open Pit prior to development of the Llama underground. WSP Golder (2022) identified that groundwater inflows to the Llama Pit are influenced by underdrainage to the Llama Underground workings. As the Llama Underground mining elevations remain below the Llama Pit in both mine plans, this hydraulic relationship is expected to remain valid for the 2026 mine plan.

For underground developments, groundwater inflow rates and TDS concentrations were generally scaled based on mining elevation. The approach assumes that groundwater quantity and quality are primarily controlled by mining depth and does not explicitly account for differences in mining rates between the two mine plans. For Umwelt Underground, the minimum mining elevation in the 2026 mine plan is approximately 10 m lower than in the Sabina Mine Plan. Echo Underground mining elevations are approximately 55 m higher and the same constant inflows were assumed to remain unchanged from the WSP Golder (2022) predictions. Goose Underground extends approximately 50 m deeper than in the Sabina Mine Plan. For mining below -100 m elevation (minimum elevation from the Sabina Mine Plan), groundwater inflows and TDS concentrations were based on the WSP Golder (2022) predictions for Umwelt Underground, which extends the deepest. Similarly, Llama Underground extends approximately 280 m deeper than in the Sabina Mine Plan; below -80 m elevation (minimum elevation from the Sabina Mine Plan), groundwater inflows and TDS concentrations were based on the WSP Golder Umwelt Underground predictions.

Differences in the timing of mine development between the two mine plans also influence the evolution of groundwater TDS concentrations over time. B2Gold Nunavut will continue to collect groundwater inflow and water quality data during operations and will use these monitoring results to refine groundwater inflow predictions and update future water management assessments, as appropriate.

2.3 ECCC #3 WASTE ROCK STORAGE AREA – RUNOFF VOLUMES AND QUALITY

ECCC Comment

The proposed quantity of waste rock stored in WRSA's is not expected to change substantially as a result of the modification, however, proposed changes to the WRSA configurations result in notable increases in the overall footprint of several storage areas. The most substantial change is to the Llama WRSA which increases from approximately 14.7 ha to 59 ha, representing a fourfold increase in surface area. An increase in surface area would be expected to increase runoff volumes and associated contaminant loads, and may also increase infiltration, resulting in greater seepage generation. In addition, a larger storage area could increase flow-path lengths and contact time between water and waste rock, potentially affecting seepage and runoff quality. As a result, changes to runoff and seepage volumes, water quality, and associated water management infrastructure requirements may be expected. Similarly, increases in surface area are also proposed for Umwelt WRSA (from 19.6 ha to 38 ha). No discussion is provided in the Project Modification Memo to outline how increases in the size of the WRSA's may impact water management volumes and quality.

Table 6.4-1 provides summaries of the Goose Property pond capacities, however, when compared with the previous version of the Water Management Plan it does not appear to include any updates to the required capacity of the Llama WRSA Pond to account for the increased WRSA footprint. The table indicates that the exiting pond will be operating at 77% capacity (same as previously); however, because no changes to the required or available capacity were included it is unclear whether the water balance and water management

assessments have incorporated the potential increase in runoff and seepage volumes, as well as potential changes in runoff and seepage quality resulting from the larger WRSA.

Recommendation: ECCC recommends that the Proponent:
ECCC recommends that the Proponent describe how the increased surface area of the waste rock storage areas may affect the runoff and seepage quality and quantity and how this was incorporated into the water balance, water quality predictions, and water management design. This should include discussion on existing water management structure capacity and whether it is sufficient for increased flows.

B2Gold Response
The updated WRSA footprints representative of the 2026 mine plan were incorporated into the Water and Load Balance Model (BGC, June 25, 2026) and used to estimate runoff and seepage. Runoff and seepage quality from the WRSAs are calculated in the model based on the quantity and lithologic composition of waste rock placed within each facility, including the relative proportions of PAG and NPAG material. Source-term concentrations for individual lithologies were developed using humidity cell testing (HCT) results and associated correction factors. Waste rock tonnages and lithologic distributions were updated in the model to reflect the 2026 mine plan.

While the footprint of the Llama WRSA increases relative to the previous mine plan, the expansion does not result in a corresponding increase in flows reporting to the Llama WRSA Pond. Under the 2026 mine plan, only the eastern portion of the Llama WRSA (corresponding to catchment LD1) drains to the Llama WRSA Pond. Contact water generated from the remaining portion of the facility is routed to the Primary Pond and subsequently to the Umwelt Open Pit once mining is complete and the pit becomes available for water storage. As a result, the increase in the overall footprint of the Llama WRSA does not directly translate into an equivalent increase in runoff volume reporting to the Llama WRSA Pond.

2.4 ECCC #4 OVERBURDEN STORAGE AREAS

ECCC Comment
The modification includes the addition of three overburden stockpiles that were not included in the previous mine plan. The Project Modification Memo states that the overburden stockpiles are near the WRSA and open pits, and that the overburden will be geochemically stable and therefore is not anticipated to result in adverse effects to the receiving environment. The memo further states that no additional monitoring is required as a result of these additions.
It is unclear how the Proponent intends to collect, monitor, and manage and surface water runoff and seepage originating from the overburden stockpiles to prevent uncontrolled discharge to the receiving environment. While the overburden may be geochemically stable, water that encounters the stockpiles may still contain elevated concentrations of suspended solids and other contaminants and may mobilize through erosion and runoff processes. The updated Water Management Plan lacks details on any water management related to the overburden stockpiles and the Water and Load Balance notably does not appear to incorporate the addition of the overburden stockpiles.

While the overburden stockpiles may not represent a significant source of contaminants relative to waste rock storage areas, they are new features on the landscape and will contribute to the overall site water balance. Exclusion of the overburden stockpiles from the site water balance may result in an underestimation of water storage capacity. Like any other stockpile or storage facility, overburden stockpiles can intercept precipitation, accumulate snow, and generate runoff which must be managed. If these stockpiles are not incorporated into the site water balance, calculations of water inputs, outputs, and storage changes may be incomplete, leading to inaccuracies in water management planning. As a result, the mine may underestimate the volume of water requiring collection or treatment and fail to fully characterize potential environmental risks associated with stockpile runoff or seepage, reducing confidence in the overall hydrologic assessment of the site. Without accounting for these features in the water and load balance, it is difficult to determine whether the current water management system has sufficient capacity to manage all contact water generated under the modified mine configuration.
In addition, the rationale that geochemical stability eliminates the need for monitoring is unclear. Geochemical stability may reduce the likelihood of metal leaching or acid generation, however, it does not necessarily negate the potential for runoff-related effects, including sediment transport, erosion, or the mobilization of naturally occurring constituents. Monitoring may still be required to verify assumptions regarding runoff quality and to confirm that the stockpiles perform as predicted under operational conditions.

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. Update the Water Management Plan to include all relevant details for the overburden stockpiles, including location, footprint area, drainage pathways, runoff collection measures, monitoring requirements, and integration with the overall site water management system.

3. Explain why the overburden stockpiles were excluded from the Water and Load Balance

4. 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.

B2Gold Response
B2Gold Nunavut acknowledges ECCC's comment regarding the water management for Overburden Stockpile and notes that appropriate surface water management and erosion control structures will be established to manage surface water/runoff and will be reflected in the next update to the Water Management Plan.

2.5 ECCC #5 CHANGES TO INFLOW RATES AND TREATMENT VOLUMES

ECCC Comment
Based on the information provided in Table 7.4-1 the modification will result in increased water flows to water management structures and subsequently increased volumes of water requiring treatment. A comparison of

Versions 5 and 6 of the Water Management Plan indicates increased flow rates and higher estimated treated volume for both the Saline Water Pond and the Umwelt and Llama Tailings Facilities. This increase in water volumes requiring management and treatment has not been acknowledged or discussed in the Project Modification Memo. No details are provided on the factors contributing to these increases, how the additional volumes will be managed by existing facilities, or what the implications may be to overall water management and treatment system performance.

Higher treatment volumes often result in greater consumption of treatment chemicals and increased production of treatment byproducts and residuals, including sludge, brine, concentrated streams, and other waste materials. These residuals require appropriate handling, storage, and disposal to minimize environmental impacts. increased treatment and discharge volumes may result in increased contaminant loadings to the receiving environment, even where treated water quality remains unchanged. While effluent concentrations may continue to meet established objectives, larger discharge volumes can increase the total mass loading of parameters released from the site. The Project Modification Memo should not only outline the changes to the infrastructure on site, but the cascading impacts on overall water management and water quantity and quality. Exclusion of this information results in difficulty interpreting how and if the changes to water quality have been properly assessed.

Recommendation: ECCC recommends the Proponent:

1. 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.

2. Describe any anticipated changes in treatment chemical requirements and treatment residual generation (e.g., sludge, brine, concentrated waste streams) and explain how these materials will be managed.

B2Gold Response

1. B2Gold Nunavut acknowledges ECCC's comment regarding the changes in inflow rates and treatment volumes. Analysis is on-going and will be provided the next iteration of the Water Management Plan.

2. The reverse osmosis (RO) treatment process at the Saline Water Pond (SWP) will generate a concentrated brine stream, which will be discharged back to the SWP. Any sludge, precipitates, or other concentrated waste streams generated during water treatment operations will be managed in accordance with site operational procedures and environmental requirements. Where appropriate and operationally feasible, these residual materials may be directed to an available Tailings Facility (TF) for containment and management. No new residual waste streams requiring separate treatment or disposal infrastructure are anticipated as part of the proposed modification.

2.6 ECCC #6 CATCHMENT

ECCC Comment

The water and load balance report states that mine infrastructure and upstream catchments were delineated based on the modification to the mine plan and mine facilities layout. One of the most obvious changes from the previous mine configuration is the change in location and footprint of the Llama WRSA as well as the addition of three overburden stockpiles.

Table 3-4 lists the catchment areas associated with the Llama WRSA as LWD1 and LWD2, however, this appears to correspond to the previous Llama WRSA location rather than the revised location shown in the updated mine layout, which appears to be in Catchment LD2. It is unclear whether the catchment areas listed for the Llama WRSA have been updated to reflect the changes or whether they remain based on the previous mine configuration.

Accurate catchment delineation is fundamental to the water and load balance, as it forms the basis for estimating runoff volumes, flow routing, water storage requirements, treatment demands, and contaminant loadings. If the revised WRSA footprint and location have not been appropriately incorporated into the catchment delineation, the resulting water quantity and water quality predictions may not accurately reflect the proposed mine configuration.

In addition, the overburden stockpiles, while depicted on Drawing 3-1, have not been incorporated into the Water and Load Balance Catchment Delineation. See also above comment on Overburden Stockpiles. Given that the overburden stockpiles represent new surface disturbances that will intercept precipitation and generate runoff, their omission from the catchment delineation may result in an incomplete characterization of site drainage areas and associated water management requirements.

Recommendation: ECCC recommends the Proponent

1. Review and confirm the accuracy of the catchment updates presented in the 2026 Water and Load Balance. Provide updated catchments, as required, and discuss implications to the Water and Load Balance conclusions.

2. Characterize the catchments associated with the Overburden Stockpiles and update the Water and Load Balance accordingly.

B2Gold Response

1. B2Gold Nunavut confirms that the catchment delineations used in the Water and Load Balance Model (BGC, June 25, 2026) are representative of the 2026 mine plan. Catchments LWD1 and LWD2 were mislabelled in Table 3-4 of the Water and Load Balance Report (BGC, June 25, 2026). Table 5 below provides the corrected catchment descriptions. LWD1 represents the catchment associated with the Umwelt Overflow WRSA, while LWD2 represents the catchment associated with the temporary stockpiles. This revision corrects a labelling error in Table 3-4 and does not affect the catchment areas represented in the model or the resulting predictions.

2. The overburden stockpile catchments have been characterized and are presented in Table 5. As runoff from the overburden stockpiles is not captured within the site water management system and ultimately drains to Goose Lake, the catchments were delineated using the stockpile footprints as the downstream boundary. The resulting catchments therefore include the stockpiles and any upgradient areas that contribute runoff to them, rather than the full downstream catchments extending to receiving-water monitoring locations or final drainage points. Approximately 14,300 m² (27%) of the Echo Overburden Stockpile footprint is located within, and accounted for as part of, the ECPND catchment.

Table 5 Revised Goose Property Catchment Descriptions and Overburden Stockpile Catchments

Prediction Node Catchment	Catchment ID	Catchment Description	Area (m2)		
			Local Catchment	Infrastructure	Roads
PN04	LWD1	Umwelt Overflow WRSA	162,500	162,500	-
PN04	LWD2	Temporary Stockpile	102,200	102,200	-
PN04	UO1	Umwelt Overburden Stockpile	261,700[a]	203,700	16,100
PN06	LO1	Llama Overburden Stockpile	873,000[a]	195,300	13,800
PN08	EO1	Echo Overburden Pile	39,100[a]	37,800[b]	-

Notes: m² = square meter

(a) Overburden stockpile catchments were delineated using the stockpile footprints as the downstream boundary and include only the stockpiles and contributing upstream areas.

(b) Approximately 14,300 m² of overburden stockpile footprint is located within the ECPND catchment.

2.7 ECCC #7 TAILINGS MANAGEMENT

ECCC Comment

The Water Management Plan and the Water and Load Balance Report both include some information on the changes to tailings management as a result of the modification. However, an updated Tailings Management Plan was not provided, despite the modification resulting in increased tailings deposition volumes and the storage of tailings in additional pits compared to the previously approved mine plan.

In addition, the Project Modification Memo provides limited discussion of these changes and does not present a consolidated summary of how the overall tailings management strategy has been revised. Without a clear summary of the proposed changes, it is difficult to determine the extent to which tailings deposition locations, storage volumes, sequencing, water management requirements, and associated environmental effects predictions differ from the previously approved mine plan. A concise summary of the changes to overall tailings management would assist reviewers in understanding the scope and implications of the proposed modification.

Recommendation: ECCC recommends the Proponent provide a consolidated summary of all proposed changes to tailings management and an updated Tailings Management Plan.

B2Gold Response

B2Gold Nunavut acknowledges the comment and confirms the proposed Llama Pit expansion and associated changes to the mining schedule do not result in any changes to the overall tailings management strategy for the Goose Project. Tailings will continue to be managed in accordance with the approved Tailings Management Plan (Version 3.0; April 2025), with deposition occurring sequentially in the planned in-pit Tailings Facilities (TFs).

Table 6 provides a consolidated summary of proposed tailing management changes between the approved Tailings Management Plan (April 2025) and the proposed modification, including tailings management locations, volumes, and sequencing. B2Gold Nunavut highlights the same three TF locations and sequence are utilized, with only minor increases in total tailings volumes. The available capacity within TFs is sufficient to accommodate tailings storage requirements for the remaining life of mine of the Project (Water Management Plan, Section 8.2.8).

As the proposed modification does not change the overall tailings management approach or strategy, no substantive changes to the Tailings Management Plan are required. Updates to the Tailings Management Plan will continue to be completed through the Project's routine review and revision process, as required, and in accordance with Part B, Item 16 of the Type A Water Licence, 2AM-BRP1831 Amendment No. 1.

Table 6: Tailings Management Changes Associated with 2026 Modification Package

Location	Tailings Management Plan V 3.0 (April 2025)			Tailings Management Plan - Aligned with June 2026 Modification Package		
	Timeline (Year and Quarter)	Tailings (Mt)	Tailings (Mm^3*)	Timeline (Year and Quarter)	Tailings (Mt)	Tailings (Mm^3*)
Echo TF	Y1, Q2 to Y4, Q4	4.46	3.19	Y1, Q2 to Y5, Q1	4.5	3.23
Umwelt TF	Y4, Q4 to Y11, Q2	9.86	7.04	Y5, Q1 to Y11, Q4	9.9	7.04
Llama TF	Y11, Q3 to Y14, Q2	3.8	2.72	Y11, Q4 to Y13, Q3	4.4	3.14
Total Project	**Y1, Q2 to Y14, Q2**	**18.13**	**12.95**	**Y1, Q2 to Y13, Q3**	**18.8**	**13.41**

Notes: * The tailings dry density is 1.4 t/m^3.

2.8 ECCC #8 DUST MANAGEMENT

ECCC Comment (New) & Request

Section 6.3 states that reduced speed limits will be considered as the principal way of controlling dust when temperatures are below freezing. There is no mention of this dust mitigation measure for warmer conditions.

Recommendation (R-08): ECCC recommends the Proponent to confirm inclusion of reduced speed limits as a dust mitigation measure for all periods.

B2Gold Response

B2Gold Nunavut acknowledges the comment and confirms reduced speed limits will be used as a dust mitigation measure for all periods of the Project. B2Gold Nunavut will update the noted text in Section 6.3 of the Waste Rock Management Plan to state: "When the temperature is below freezing, dust suppression using

water or an approved chemical may pose a safety hazard for travel; if warranted, reduced speed limits will be considered as the principal way of controlling dust during these periods. Reduced speed limits will also be considered as a key dust mitigation measure throughout the year as appropriate."

3. KIA

B2Gold Nunavut acknowledges comments from the Kitikmeot Inuit Association (KIA) and has provided the requested information in the following sections.

3.1 KIA #1

KIA Comment & Request
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 (R-1): Establish test plots for local plants/seeds and evaluate what grows best with KIA and Traditional Knowledge

B2Gold Response
B2Gold Nunavut acknowledges KIA's comment and will ensure the ICRP is updated to more clearly describe reclamation research programs as part of a future consolidated update that addresses all updates required through NWB review and approval of the June 2026 Management Plans and Modification Package.

4. DFO

B2Gold Nunavut acknowledges comments from the Department of Fisheries and Oceans (DFO) and has provided the response below

4.1 DFO LAKE 997 UNDER ICE WATER WITHDRAWAL

DFO Comment #1
DFO has reviewed B2Gold Nunavut's Modification Request and associated Updated Management Plans (received by the NWB on June 27, 2026) in accordance with our mandate and has no comments at this time.

B2Gold Response
B2Gold Nunavut acknowledges DFO's comment and understands that there are no responses required at this time.

5. REFERENCES

B2Gold Nunavut. 2022. Goose Mine Waste Rock Management Plan V2. April 2022.

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Sabina (Sabina Gold & Silver Corp.). 2015. The Back River Project, Final Environmental Impact Statement. Submitted to the Nunavut Impact Review Board. November 2015.

Sabina. 2017. Revised Type A Water Licence Application for Sabina Gold & Silver Corp. Back River Project. Submitted to the Nunavut Water Board. October 4, 2017.

Sabina. (2021). Back River Project: Interim Closure and Reclamation Plan, July 2021.

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