



Fisheries and Oceans  
Canada

Pêches et Océans  
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Fish and Fish Habitat Protection Program  
Arctic Region  
301 – 5204 50th Ave. (Franklin)  
Yellowknife, Northwest Territories  
X1A 1E2

Programme de protection du poisson et de son habitat  
Région de l'Arctique  
301 – 5204 50th Ave. (Franklin)  
Yellowknife, Territoires du Nord-Ouest  
X1A 1E2

*Our file*      *Notre référence*  
12-HCAA-CA7-00007

*Your file*      *Votre référence*  
2AM-BRP1831

May 16, 2025

**Subject:      B2Gold Nunavut – Back River Project 2024 Annual Water Licence  
Report – 2AM-BRP1831**

To whom it may concern,

On April 16th, 2025, the Nunavut Water Board invited parties to comment on the Back River Project – 2024 Annual Report for Water Licence 2AM-BRP1831. The Fish and Fish Habitat Program of Fisheries and Oceans Canada (FFHPP) appreciates the opportunity to review the report in accordance with our mandate and offers comments below.

### **Comment #1 – Fish Entrainment and Impingement**

Direct fish mortality can occur during water withdrawal activities through entrainment/impingement. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when a fish is held in contact with the intake screen and is unable to free itself. As per Part E, Condition 7 of the Water Licence, fish screens are required on all water intake hoses to avoid entrainment and impingement of fish. Please confirm whether fish screens were used in compliance with [DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater](#).

### **Comment #2 – Water Withdrawal from Watercourses**

Part E, Condition 6 of the Water Licence states water withdrawal from streams should not be conducted unless authorized and approved in writing. Appendix A shows withdrawal from watercourses for winter ice road construction in 2024. When withdrawing water from watercourses, B2Gold should follow the [Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada](#).

### **Comment #3 – Winter Water Withdrawal**

Excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat. For water withdrawal associated with the winter road, available water capacities

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for each approved waterbody were calculated by determining the surface area of each waterbody then multiplying by 10 cm. Please describe how this methodology conforms with [DFO's Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut \(2010\)](#). All project-related winter water withdrawals (inclusive of winter ice road and all other operations) should conform with this protocol.

#### **Comment #4 – General Comment**

B2Gold should review and implement any relevant DFO protective measures for fish and fish habitat and standard codes of practice (<https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html> and <https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html>) and respect the Nunavut in-water works restricted activity timing windows (<https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/nwt-eng.html>). By doing so, works, undertaking or activities where impacts to fish and fish habitat can be avoided.

In order to comply with the *Fisheries Act*, it is recommended that B2Gold follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html> and <https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html>).

B2Gold are also asked to respect the NU in-water works restricted activity timing windows ([Projects Near Water - Nunavut Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat \(dfo-mpo.gc.ca\)](#)). By doing so, works, undertaking or activities where impacts to fish and fish habitat can be avoided.

If the proposal meets the criteria for a site specific review (e.g., withdrawing water during the Restricted Activity Period), as described on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html>), they should complete and submit the request for review form available on the website (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html>).

It is also B2Gold's *Duty to Notify* DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to [DFO.ARCENTriage-TriageGEARC.MPO@dfo-mpo.gc.ca](mailto:DFO.ARCENTriage-TriageGEARC.MPO@dfo-mpo.gc.ca).

Yours sincerely,



William Richmond  
Biologist  
Fish and Fish Habitat Protection Program  
Fisheries and Oceans Canada