Fisheries and Oceans Canada | Pêches et Océans Canada

Fish and Fish Habitat Protection Program
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Our file *Notre référence*
12-HCAA-CA7-00007

Your file *Votre référence*
2AM-BRP1831

September 24, 2026

Subject: B2Gold Nunavut – Construction of a New Desalination Plant at the Allen Kapolak Marine Laydown Area – Technical Memo

To whom it may concern,

On September 21st, 2026, the Nunavut Water Board invited parties to comment on the Construction of a New Desalination Plant at the Allen Kapolak Marine Laydown Area – Technical Memo. The Fish and Fish Habitat Program (FFHPP) of Fisheries and Oceans Canada (DFO) appreciates the opportunity to review the report in accordance with our mandate and offers comments below.

Comment #1 – Seawater Intake

As described in Section 2 of the Technical Memo, B2Gold Nunavut proposes to withdraw seawater from Bathurst Inlet for desalination purposes during operation of the new desalination plant. The proposed locations and volumes of both seawater withdrawal and brine discharge are proposed to remain consistent with those of the existing desalination plant. Though it was not explicitly stated by B2Gold Nunavut, it is assumed that a fish screen will be installed on the seawater intake for the duration of water withdrawal activities at the new plant. Please note that end-of-pipe fish screen designs were previously addressed through a DFO Code of Practice, but have now been updated into a DFO standard.

Please confirm an end-of-pipe fish screen will be installed on the water intake conforming with the DFO standard: Water intake end-of-pipe fish screens.

Comment #2 – Other In-Water Works

The Technical Memo does not propose any new in-water impacts regarding the construction and operation of the new desalination plant. Please confirm whether any in-water works, maintenance activities, modifications, or inspection activities below the ordinary high-water mark are required to facilitate installation and operation of the new

desalination plant. If none are required, please explicitly state that the existing intake and discharge infrastructure will remain unchanged, and no in-water work is proposed.

If relevant, in-water works regarding the existing desalination infrastructure may be applicable to the DFO Code of Practice: In-water structures: Maintenance and repair.

Comment #3 – General Comment

In order to comply with the *Fisheries Act*, B2Gold Nunavut should review and implement any relevant DFO protective measures for fish and fish habitat, standard codes of practice, (https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html 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, undertakings, 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), the B2Gold Nunavut 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 Nunavut'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.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca.

Regards,



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