P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Kugluktuk
ᖁᑦᓗᖅᑐᖅ

Bathurst Inlet
Kingaok
ᖃᙵᓚᐅᓐ

Bay Chimo
Umingmaktok
ᐅᒥᖕᓚᵇᑐᖅ

Cambridge Bay
Ikaluktutiak
ᐃᖅᓗᵇᑐᑦᑎᐊᖅ

Gjoa Haven
Okhoktok
ᐅᖅᓱᖅᑐᖅ

Taloyoak
ᑕᓗᕐᕼᐊᖅ

Kugaaruk
ᑯᑌᕐᕼᒃ

September 29, 2026

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

Re: Construction of a New Desalination Plant at the Allen Kapolak Marine Laydown Area for 2AM-BRP1831.

Dear Richard,

Thank you for the opportunity to review and comment on the construction of a New Desalination Plant at the Allen Kapolak Marine Laydown Area for 2AM-BRP1831. After reviewing the construction plans provided by B2Gold Nunavut, KIA and its consultants do have several comments and recommendations.

Areas where significance requiring further supporting information or changes to construction, which may be required:

- (a) The discharge criteria are not being met, (b) the maximum intake and discharge volumes will not be altered and (c) the mitigation in place to limit impacts to fish, aquatic life and water quality will remain the same. Note, we initially evaluated the effects associated with the existing desalination plant based on the maximum capacity authorized rather than the more moderate capacity achieved; impacts associated with the new system will still fall within the constraints of the Effects Assessment/Project Certificate (essential as the system discharges to the marine environment) and Water License NO: 2AM-BRP1831
- Understanding the additional capacity and increased volume of the new desalination plant, which will increase volume of treated sewage management at the site. This application does not address that increase, we expect it too will remain within the constraints of the Project Certificate No.007 and Water Licence NO 2AM-BRP1831

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

- Location; Figure 2 of the B2Gold memo "construction of a new desalination plant at the Allen Kapolak Marine Laydown Area" dated September 19, 2026, shows the desalination plant to be located on the existing gravel pad:

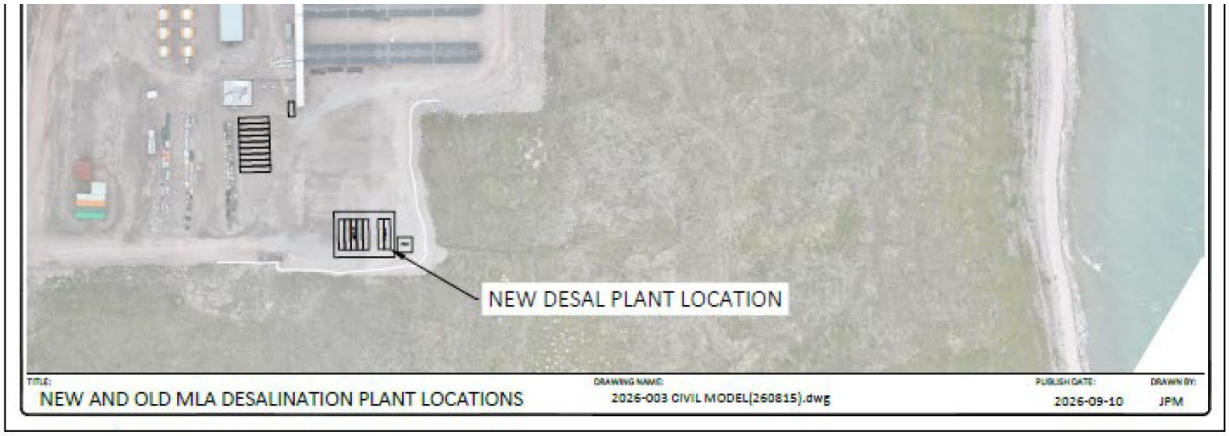
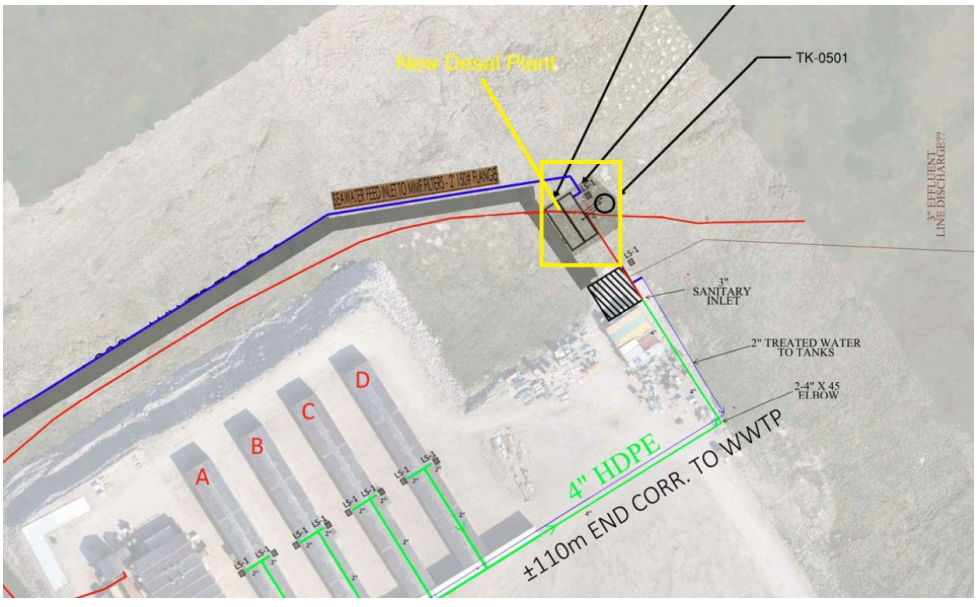


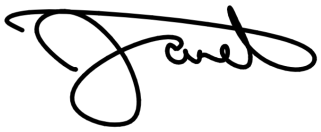
Figure 2: Locations of Existing and New Desalination Plants

- However, drawing "260910 2AM-BRP1831 Desalination Plant at the MLA B2Gold Response Drawing-IMLE" (2026-03-24) does show the plant to be outside the existing gravel pad, directly located on the tundra (see screenshot below). This location is not acceptable and B2Gold should confirm where the new desalination plant is located.



P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Sincerely,



Janet Kadlun

Senior Project Officer

Kitikmeot Inuit Association