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MEMO

From	Macoura Koné, Manager, Environment, B2Gold Nunavut
To	Richard Dwyer, Manager of Licensing, Nunavut Water Board (NWB)
Cc	Sergey Kuflevskiy, Technical Advisor, Nunavut Water Board (NWB) Ali Shaikh, Technical Advisor, Nunavut Water Board (NWB) Dan Gagnon, General Manager, B2Gold Nunavut Jamie Richards, Operations Manager, B2Gold Nunavut
Ref.	Type A Water License 2AM-BRP1831
Date	October 05, 2026
Subject	Replacement of the Existing Desalination Plant at the AKMLA – Responses to Comments

Dear Mr. Dwyer,

B2Gold Back River Corp (B2Gold Nunavut) received on October 02, 2026, from the Nunavut Water Board (NWB) review comments for the construction of a new desalination plant to replace the existing one at its Marine Laydown Area (MLA) also referred to as Allen Kapolak Marine Laydown (AKMLA).

Comments were received from Fisheries & Oceans Canada (DFO), the Kitikmeot Inuit Association (KIA), and Crown Indigenous Relations & Northern Affairs Canada (CIRNAC). Of the three (3) regulatory bodies', responses were required only for DFO and the KIA. B2Gold Nunavut provides in the following sections, responses and clarification requested.

Should you have any questions or require additional information, please feel free to contact us.

Sincerely,



Macoura Koné, Ph.D, P. Geol., P. Geo.
Manager Environment
B2Gold Nunavut

1. DFO

1.1 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: Water intake end-of-pipe fish screens

B2Gold Nunavut Response to Comment #1:

B2Gold Nunavut confirms that an end-of-pipe fish screen is currently installed on the existing seawater intake. The same intake end-of-pipe fish screen will be used for the new desalination plant. B2Gold Nunavut will conduct a full review prior to operation of the new desalination plant to ensure the water intake end-of-pipe fish screens comply with the requirements outlined in DFO' Standard.

1.2 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 structure: Maintenance and repair

B2Gold Nunavut Response to Comment #2:

B2Gold Nunavut confirms that the existing intake and discharge infrastructures will remain unchanged and no in-water or near water work is required. Similarly, no work will be conducted below the ordinary high-water mark as part of the installation of the new desalination plant or discharge line. The new plant will continue to operate within the applicable authorized discharge and salinity limits.

1.3 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) 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 Nunavut Restricted Activity Timing Window for the Protection of Fish and Fish Habitat, 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.

B2Gold Nunavut Response to Comment #3:

B2Gold Nunavut confirms that no in-water or near water works are required for the replacement of the desalination plant (new desalination plant), therefore this activity is not expected to cause fish death or harmful alteration, disruption, or destruction of fish habitat. The new replacement plant will use the existing infrastructures for water withdrawal. However, B2Gold will continue to follow the standard codes of practice and will implement (if required) any relevant measures to avoid harmful impacts and mitigate risks to fish and fish habitat. The preventive and mitigation measures will include:

Avoidance measures:

- There will be no fishing or killing of fish and no explosives will be used near water.

Mitigation measures:

- All intake and discharge pipelines will be screened in accordance with the DFO' standard (i.e., water intake end-of-Pipe fish screen guidelines) and B2Gold Nunavut Water Management Plan requirements.
- The water withdrawal rate will also be controlled such that fish do not become impinged on screens.

As discussed, B2Gold Nunavut has also reviewed the information provided by DFO (links above) and does not believe the AKMLA new replacement plant meets the criteria for a site specific review, therefore B2Gold Nunavut will not be completing and submitting the request for review form described on DFO's website.

2. KIA

2.1 COMMENTS # 1 & 2

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.

B2Gold Nunavut Response to Comments # 1 & 2:

Discharge criteria, intake and discharge volumes

B2Gold Nunavut confirms that the discharge criteria will be met and the maximum intake and discharge volumes will not be altered. The installation of the new desalination plant will not result in an increase in seawater intake beyond volumes that are currently authorized. For example:

- The new plant with maximum of 3 reverse osmosis (RO) units running will give 5.4 m^3/h or 129.6 m^3/day. These discharge rates are lower than the maximum of 30 m^3/h or 720 m^3/day stated in the Water Management Plan (i.e., authorized volumes).
- The new plant with maximum of 3 RO units running will give 2.25 m^3/h or 54m^3/day (maximum). These intake rates are lower than the maximum of 33 m^3/h or 792 m^3/day stated in the Water Management Plan (i.e., authorized volumes).

Mitigation and water quality

B2Gold Nunavut confirms that an end-of-pipe fish screen is currently installed on the existing seawater intake. The same intake end-of-pipe fish screen will be used for the new desalination plant. B2Gold Nunavut will conduct a full review prior to operation of the new desalination plant to ensure the water intake end-of-pipe fish screens comply with the requirements outlined in DFO' Standard. To avoid repetition, please refer to B2Gold Nunavut responses provided to DFO's Comment #3 (i.e., General Comment above) for preventive and mitigation measures that will be implemented.

Engineered Controls such as sediment and erosion control devices, including silt fencing and spring berms will also be installed to protect the marine receiving environment.

Discharge water quality will not be a concern as B2Gold obtained authorization on April 17, 2026 from the Nunavut Water Board to install a sewage treatment plant (STP) at the AKMLA. This plant will effectively treat the grey water prior to discharge.

Volume of treated sewage management

The volume of treated sewage management (~88 m^3/day) will remain within the authorized limits.

2.2 COMMENTS #3 & 4

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.

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.



Figure 2: Locations of Existing and New Desalination Plants

B2Gold Nunavut Response to Comments # 3 & 4:

B2Gold Nunavut confirms that the new desalination plant will not be placed on the tundra. As outlined in Figure 2 (above) the new plant will be placed on a pre-existing, leveled gravel pad and on concrete slabs within the AKMLA footprint.