Fisheries and Oceans Canada | Pêches et Océans Canada

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

Your file *Votre référence*
2AM-BRP1831

September 24, 2026

Subject: **B2Gold Nunavut – Rascal Stream East Fishway Design and Construction at Goose Mine Site – Technical Memo**

To whom it may concern,

On September 18th, 2026, the Nunavut Water Board (NWB) invited parties to comment on the **Rascal Stream East Fishway Design and Construction at Goose Mine Site – 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 – DFO Review Complete

DFO has previously reviewed a B2Gold Nunavut submission for the *Rascal Stream East Fishway Design and Construction at Goose Mine Site,* received on September 10th, 2026. The submission was sent directly to the FFHPP - as required under *Fisheries Act* Authorization 12-HCAA-CA7-00007 - and included a monitoring plan to be implemented during construction and post-construction. The B2Gold Nunavut submission to FFHPP is very similar to the submission to the NWB, with the bulk of the content comprised of the Technical Memorandum developed by WSP in Appendix 1.

The relevant conditions to this submission within the authorization are conditions 3.2.2 and 6.4 – see below:

3.2.2. The Proponent shall develop a monitoring plan to demonstrate the effectiveness of Rascal Diversion Channel. This plan will need to be approved by DFO and clearly demonstrate that adequate flow is maintained in the stream for Arctic Grayling to access and use the upstream sections (i.e., Reach 5, 6 and 7, Little Rascal Pond and Rascal Lake). The plan shall also include an annual crossing inspection conducted during freshet at the clear-span bridge at the Gander Outflow to ensure barriers to fish do not form over time as a result of crossing damage due to ice blockage, flooding or movement of debris. In the event that monitoring demonstrates additional serious harm to Arctic Grayling not already covered by this Authorization, the Proponent shall come up with an offsetting strategy to account for the additional serious harm.

6.4. The final design and monitoring plan for the Rascal Stream diversion shall be submitted to DFO for approval 60 days prior to the beginning of diversion works (as per condition 3.2.2 of this authorization).

FFHPP responded to the *Rascal Stream East Fishway Design and Construction at Goose Mine Site* submission with comments on September 11th, with B2Gold Nunavut responding to those comments on September 14th. FFHPP determined that the relevant FAA conditions were met by B2Gold Nunavut on September 22nd , 2026. Condition 3.2.2 was met in Section 5 of Appendix 1, through description of the proposed monitoring activities, including fish passage of Arctic Grayling to Reach 5, 6 and 7, Little Rascal Pond and Rascal Lake, and annual freshet inspections at the Gander Outflow clear span bridge. Condition 6.4 was met through submission of the document at least 60 days prior to construction (assuming construction does not begin prior to November 9th, 2026).

If there are further questions regarding FFHPP's review, or the conditions of the FAA, please contact William Richmond at william.richmond@dfo-mpo.gc.ca or 867-444-9507.

Regards,



William Richmond
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