



Fisheries and Oceans  
Canada

Pêches et Océans  
Canada

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

January 14, 2025

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

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

**Subject:      B2Gold Back River Project: Goose Lake Tote Storage Facility Design  
& Construction Summary Memo**

To whom it may concern,

On January 2, 2025, the Nunavut Water Board invited parties to comment on the B2Gold Back River Project: Goose Lake Tote Storage Facility Design & Construction Summary Memo (Water License 2AM-BRP1831). The Fish and Fish Habitat Program (FFHPP) of Fisheries and Oceans Canada (DFO) has reviewed the document in accordance with DFO's mandate and provides the following comments.

**Comment DFO #1:**

The use of explosives in or near aquatic environments can cause harm to fish by rupturing the swim bladder and/or damaging other internal organs, and damaging incubating eggs. It could also result in physical and/or chemical alterations to fish habitat. If explosives are used in or near water, the Proponent should follow the *Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters* (Wright and Hopky, 1998).

The Proponent should use a blasting threshold limit of 50 kPa for instantaneous pressure change in order to appropriately mitigate effects of blasting on fish as recommended in Cott and Hanna (2005).

Reference: Cott P and Hanna B. 2005. Monitoring Explosive-based Winter Seismic Exploration in Waterbodies, NWT 2000-2002. Pages 473-490. In: Proceedings of the Offshore Oil and Gas Environmental Effects Monitoring Workshop: Approaches and Technologies. Battelle Press. Columbus. 601 p + index.

**Comment DFO #2:**

DFO requests the Proponent provide information on whether blast-induced water overpressure and particle velocity will be monitored at the nearest point in Goose Lake to verify thresholds are not exceeded.

**Comment DFO #3**

If the proposal meets the criteria for a site specific review (e.g., the Proponent cannot follow the guidelines provided due to project limitations), 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>).

**Comment DFO #4:**

It is the proponent'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