

MEMO

From	Merle Keefe
To	Richard Dwyer
Ref.	2AM-BRP1831
Date	24 March 2024
Subject	2024 Winter Ice Road Technical Memorandum – Responses to Review Comments

Dear Mr. Dwyer,

Please find B2Gold Nunavut's responses to comments received on the 2024 Winter Ice Road Technical Memorandum.

Sincerely,



Merle Keefe
Manager, Environment
B2Gold Nunavut

Cc: Kristina Benoit, Manager, Environmental Permitting, B2Gold Nunavut

Interested Party:	Kitikmeot Inuit Association (KIA)	TRC NO.:	KIA-NWB-01
Re:	Date Mix-Up		

KIA's Comment:

First there appears to be a mix-up with the years in Section 4 when the memorandum refers to evaluating ice conditions in late 2023 and the anticipated start is in early January 2024. This is considered a minor error in the memorandum.

B2Gold Nunavut Response:

Apologies, B2Gold Nunavut confirms the date error.

Interested Party:	Kitikmeot Inuit Association (KIA)	TRC No.:	KIA-NWB-02
Re:	Winter Ice Road Satellite Imagery Observations		

KIA's Comment:

The KIA has checked free Sentinel satellite images of the WIR location, which are included below. From these pictures the WIR is clearly visible in the summer. The images are from August 2021 (on the left), prior to the WIR, and then August 2022 and August 2023 where one can easily see the road. Considering the slope between Bathurst Lake and Bathurst Inlet, the KIA has some concerns regarding changes in surface drainage conditions and potential impacts. The KIA therefore asks for the status of the summer terrain conditions along the WIR corridor to have a better understanding of the potential impact of the WIR on the terrain.

B2Gold Nunavut Response:

B2Gold Nunavut successfully upgraded the approved subbase of the Winter Ice Road (WIR) section between Bathurst Inlet and Bathurst Lake. The subbase is a thin layer of aggregate placed along the base of the WIR to help with construction and operation of difficult sections. It is likely this upgrade that is visible. In 2023, drainage conditions were assessed along the duration of the WIR where portages sections were completed, and no issues were identified. However, B2Gold Nunavut commits to completing a 2024 summer survey of the terrain and surface drainage conditions between Bathurst Inlet and Bathurst Lake as requested by the KIA, and will provide this information within its 2024 Annual Report.

Interested Party:	Kitikmeot Inuit Association (KIA)	TRC No.:	KIA-NWB-03
Re:	Winter Ice Road Closure		

KIA's Comment:

Section 6 states closure of the road will include recovery of sand along the alignment, but no methods are provided as to how this difficult task will be accomplished.

B2Gold Nunavut Response:

Thank you for your comment, B2Gold Nunavut confirms that any minor amounts of sands transferred from a portage onto a frozen waterbody would be scraped off of the frozen waterbody with equipment prior to melt and road close.

Interested Party:	Kitikmeot Inuit Association (KIA)	TRC No.:	KIA-NWB-04
Re:	Water Withdrawal and Pipe Screens		

KIA's Comment:

Section 7 and Appendix B present water withdrawal limits for 55 lakes along the road alignment. There are no issues identified with the bathymetry work or conclusions on maximum water withdrawals. However, the DFO requirement for using end of pipe screens on fish-bearing water bodies (DFO 2020) is not discussed. If the fish bearing status of these lakes along the alignment is not known, fish screens need to be used on all intake pipes/hoses used to draw water for road construction

B2Gold Nunavut Response Provided on January 29, 2024:

Thank you for your comment, B2Gold Nunavut confirms that fish-bearing screens are utilized on water intakes regardless of the waterbody along the WIR.

Interested Party:	Environment and Climate Change Canada (ECCC)	TRC No.:	ECCC-NWB-01
Re:	Date Error		

ECCC's Recommendation(s):

ECCC recommends that the Proponent clarify if the dates stated in the Technical Memorandum are correct or not. If not, ECCC recommends the Proponent provide the date corrections accordingly.

B2Gold Nunavut Response:

Apologies, B2Gold Nunavut confirms the date error. In Section 4, the first paragraph should state 'late 2023', and the second paragraph should state 'January 2024'.