

Environmental Protection Operations Directorate  
Prairie & Northern Region  
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ECCC File: 6100 000 115/002  
NWB File: 2AM-BRP1831



November 13, 2024

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

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

Dear Richard Dwyer:

**RE: 2AM-BRP1831 – B2Gold Nunavut – Back River Project – 2025 Winter Ice Road  
Technical Memorandum**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Technical Memorandum.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Figure Title and Axis Naming**

Reference(s)

- Figure 2: A Comparison of Monthly Total Precipitation and Mean Air Temperature for 2017 versus 'Normals' (1981-2010), Appendix B: Winter Ice Road Water Withdrawal Evaluation Memo, Back River Project 2025 Winter Ice Road Technical Memorandum, October 22, 2024



### Comment

Figure 2 in Appendix B of the Winter Ice Road Technical Memorandum, is intended to display both line plots of monthly average temperature, and bar plots of precipitation accumulating from October 1st to each month end. The temperature axis and component of the figure caption are correctly worded; however, it is customary for the term Total Precipitation to be used to indicate the amount that occurred for each month rather than the cumulative value. ECCC suggests that the term 'Cumulative Precipitation' would be a more accurate title for the precipitation axis on this figure.

### ECCC Recommendation(s)

ECCC recommends that, for future reports, the Proponent label this figure as 'A Comparison of Cumulative Precipitation and Mean Air Temperature for [year] versus 'Normals' [date range]', and label the precipitation axis as 'Cumulative Precipitation (mm)' to be a more accurate reflection of the data presented.

If you need more information, please contact Stephinie Mallon at [Stephinie.Mallon@ec.gc.ca](mailto:Stephinie.Mallon@ec.gc.ca).

Sincerely,

Stephinie Mallon  
A/ Senior Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)