



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
(Licence No. 2AM-BRP1831)
Our file - Notre référence
GCDocs#144414262

March 20, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Modification Request for the Back Bay Project, Type A Water Licence No. 2AM-BRP1831

Dear Richard,

Thank you for the February 24, 2026, invitation to review the modification request, submitted by B2Gold Nunavut for Type A Water Licence No. 2AM-BRP1831.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC's comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact Jordan Beer at jordan.beer@rcaanc-cirnac.gc.ca or Andrew Keim at Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Jordan Beer, M.Sc.,
Water Management Coordinator

Technical Review Memorandum

Date: March 20, 2026

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Jordan Beer – Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Modification Request for the Back Bay Project, Type A Water Licence No. 2AM-BRP1831

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Back River Project is a gold mine operated by B2Gold Nunavut in the West Kitikmeot region. The project consists of two main areas: the Goose Property, located at 65°32’42” N and 106°25’43” W, and the Marine Laydown Area (MLA), located at 65°32’40” N and 106°25’32” W.

B2Gold Nunavut (B2Gold) has submitted a modification request to upgrade the toilet facilities at the MLA and build a new Sewage Treatment Plant (STP). The new low-flush toilets will replace the Pacto toilets currently servicing the 75 person MLA camp. Water from the new toilets will be sent for treatment at the new STP, eliminating the need to handle and incinerate raw sewage tubes. The STP will also treat greywater at site, increasing the quality of treated greywater discharge. The STP will discharge to the tundra at a site verified by an inspector, then drain towards Bathurst Inlet. Discharge monitoring, discharge criteria and sludge management will follow the approved methods currently established at the Goose STP. The new facilities are estimated to increase wastewater discharge at site by approximately 10%, but increase the overall quality of wastewater discharge.

CIRNAC provides the following comments and recommendations pertaining to the modification request. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Erosion and Sedimentation Controls

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
260223 2AM-BRP1831 Modifciation Request-IMLE	B2Gold Nunavut, February 2026
210831 2AM-BRP1831 Water Licence-OSKE	Nunavut Water Board, August 2021
171219-12MN036-NIRB Project Certificate No 007-FT3E	Nunavut Impact Review Board, December 2017
171005 2AM-BRP----SD05-WaterMgmtPlan_IMLE_Part1	Sabina Gold & Silver Corp., October 2017

C. RESULTS OF REVIEW

1. Sedimentation and Erosion Control Measures

Comment:

Part G-3g of the Water License 2AM-BRP1831 requires all modification applications to contain proposed sediment and erosion control measures.

B2Gold stated the following regarding sediment and erosion control measures:

“It is also noted that the downslope receiving environment at the MLA is, and will remain, Bathurst Inlet, and that there is no potential for effects on the freshwater environment or for sedimentation or erosion”.

However, CIRNAC is of the opinion that the proposed construction activities have the potential to create sedimentation and erosion.

Section 9.4.1 of the document “201013 2AM-BRP1831 Attachment 2-Appendix B-WaterMgmtPlan-IMLE” provides a discussion of possible sediment and erosion control measures to be used during ongoing construction, but none of these measures have been discussed in the modification request. CIRNAC is concerned that B2Gold may not implement appropriate measures to contain sedimentation and erosion during the proposed construction activities.

Recommendation:

R-01) CIRNAC recommends that B2Gold propose specific sediment and erosion control measures to be followed during the construction of the toilet facilities and the STP.