



Richard Dwyer <richard.dwyer@nwb-oen.ca>

Request for Change to Schedule I of Type A Water Licence 2AM-BRP1831

John Roesch <JRoesch@lands.kitia.ca>
To: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Wed, Jun 7, 2023 at 9:07 AM

Hello Richard, the KIA thinks the requested change to Schedule I of the Type A Water License 2AM-BEP1831 is relatively minor change. B2Gold’s proposed change from “prior to discharge” to “monthly” is acceptable. However, with respect to BRP-17 (discharges to land), KIA cautions against shifting the point of compliance from the end of pipe to the location where flows enter the aquatic receiving environment. The permitted concentrations of phosphorus, biological oxygen demand (BOD) and fecal coliforms benefit from some degree of attenuation along the flow path as the discharge migrates towards the nearest watercourse or waterbody. KIA therefore recommends that the Nunavut Water Board maintain the point of compliance at the end of pipe to reduce the impact to the aquatic environment. This is also consistent with the intent of the Mary River licence which allows for some degree of attenuation both for discharges at the Mine Site which flow through a creek to the larger river system (the receiving environment), and at the Port Site where discharges again flow through a surficial flow path prior to reaching the ocean.

Thank you.

John Roesch

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