

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 115/002
NWB File: 2AM-BRP1831



June 15, 2023

via email at: 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 – Request for Change to Schedule I

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned request for change to Schedule I.

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 mitigation measures, and providing advice to decision makers on activities needed to mitigate these environmental effects. 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. Clarification of SNP Station Description

Reference(s)

- Section 2.0 – Change Being Requested

Comment

In the modification request, the Proponent is requesting a change to the location of monitoring associated with discharge from the sewage treatment plant and a change in frequency. Section 2 of the submission provides an updated description of Surveillance Network Program (SNP) station BRP-17 as follows:

Goose Property Sewage Treatment Plant (discharge point for treated sewage into freshwater ~~onto land~~ into freshwater)



ECCC notes that, as proposed, the description of the monitoring location is not clear. The wording includes reference to the sewage treatment plant and the “discharge point”, when it is the intention to monitor prior to entering Goose Lake.

ECCC Recommendation(s)

ECCC recommends that the Proponent update the description for SNP station BRP-17 to accurately describe the intent and location of monitoring.

2. Updates to the Water Management Plan

Reference(s)

- Section 4.0 – NPC and NIRB Consideration

Comment

The Proponent is proposing changes to both the location and monitoring frequency associated with BRP-17. The location is proposed to change from the point of discharge to land, to a point prior to entry into Goose Lake and the frequency is proposed to change from “prior to discharge” to “monthly.” Overall, the Proponent notes that this change is “manifestly insignificant” and does not require any changes to the Water Management Plan.

ECCC notes that the change in frequency and location have potential implications on overall water management. Quality is no longer proposed to be confirmed prior to discharge, and samples are to be taken in closer proximity to water bodies rather than upland. Given this change in approach, there is the potential that quality of discharge may not be confirmed prior to it entering receiving waters. It is unclear whether the existing approved Water Management Plan has identified sufficient contingency options in the event that discharge is found to exceed Effluent Quality Criteria (EQC) associated with sewage discharge once sampling has been conducted in proximity to Goose Lake.

ECCC Recommendation(s)

ECCC recommends the Proponent identify measures in the existing Water Management Plan that would be implemented in the event that effluent quality at the new monitoring point was found to not meet EQC. If sufficient contingency measures are not identified in the existing Water Management Plan, ECCC recommends that the Proponent update the Water Management Plan.

If you need more information, please contact Victoria Shore at Victoria.Shore@ec.gc.ca.

Sincerely,

[original signed by]

Victoria Shore
Senior Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)