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Prairie & Northern Region  
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ECCC File: 6100 000 115/001  
NIRB File: 12MN036



June 23, 2025

via email at: [info@nirb.ca](mailto:info@nirb.ca)

Aghalingiak Ohokannoak  
Public Registry Coordinator  
Nunavut Impact Review Board  
29 Mitik Street  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Aghalingiak Ohokannoak:

**RE: 12MN036 – B2Gold Back River Corp. – Back River Project – 2024 Annual Report**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) by B2Gold Back River Corp. ("the Proponent") regarding the above-mentioned annual report.

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 emergencies preparedness and responses. 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.

ECCC will copy the NIRB on any water quality comments submitted to the Nunavut Water Board (NWB) for the review of the Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831, due July 16, 2025.

The following comments are provided:

**1. Canadian Ambient Air Quality Standard for annual NO<sub>2</sub>**

Reference:

Back River Project 2024 Annual Report  
-Section 4.5.1 Air Quality, Project Certificate Condition No. 2

Comment:



In Project Certificate Condition No. 2, there are references to the Canadian Ambient Air Quality Standard (CAAQS) for annual NO<sub>2</sub> specifying concentrations of 17 ppbv. This standard became effective in 2020, but a new standard became effective in 2025.

ECCC Recommendation:

For future annual reports, ECCC recommends the proponent refer to the current CAAQS for annual NO<sub>2</sub> of 12 ppbv.

## **2. Tank farm installation design**

References:

Back River Project 2024 Annual Report  
-Section 3.1 (p. 3-1)

Back River Project 2024 Annual Report for Water Licence 2AM-BRP1831  
-Section 1 (pdf p. 12)  
-Section 2, Subsection 12 (pdf p. 19)

Comment:

The Proponent stated in the annual report to NIRB that “The fuel tank containment area at the MLA was enlarged to facilitate additional storage, and initial construction for similar storage at Goose commenced”. It is noted that identical text was used in the Proponent’s annual report to Nunavut Water Board (NWB) for water licence 2AM-BRP1831 (Section 1, pdf p. 12); the report to NWB also mentions “Installation of 4 x 100 barrel tank farm for additional storage and redundancy” (Section 2, Subsection 12, pdf p. 19). There was no reference to the installation of the 4 x 100 barrel tank farm in the report to NIRB.

If the enlargement of the fuel tank containment area at the MLA and Goose tank farms is a separate activity from the installation of the 4 x 100 barrel tank farm, ECCC recommends that the installation of the 4 x 100 barrel tank farm be mentioned in the report to NIRB, along with clarification to ensure that the 4 x 100 barrel tank farm has appropriate secondary containment in place and is located at least 30 meters from any waterbody. Without proper containment, a spill could adversely affect fish, fish habitat, migratory birds and water quality.

ECCC Recommendation:

ECCC recommends the Proponent:

- Provide clarification on whether the enlargement of the fuel tank containment area at the MLA and Goose tank farms (referred to in the report to NIRB) and the installation of the 4 x 100 barrel tank farm (referred to in the report to NWB) are separate activities.
- If they are separate activities, include mention of the 4 x 100 barrel tank farm in the report to NIRB, and provide:
  - Details on the spill containment and mitigation measures associated with the 4 x 100 barrel tank farm.

- The proximity of the 4 x 100 barrel tank farm to nearby waterbodies to confirm compliance with standard siting best practices.

### **3. Species at risk updates**

#### Reference:

Back River Project 2024 Annual Report

-Appendix C: Back River Mine 2024 Wildlife Mitigation and Monitoring Report

-Section 10, Table 10-1

#### Comment:

Species at risk are assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) or added to Schedule 1 of the Species at Risk Act (SARA) on a regular basis. ECCC commends the proponent for adhering to Term & Condition No. 55 of Project Certificate No. 007 by ensuring mitigation and monitoring is updated regularly to maintain consistency with changes to species at risk listings in the Back River Mine 2024 Wildlife Mitigation and Monitoring Program Report (WMMPR).

Table 10-1 of the WMMPR (Species of Conservation Concern Known or Potentially Occurring at the Back River Mine, 2024) identifies Horned Grebe as a species of Special Concern by COSEWIC since 2023, and as not listed on SARA Schedule 1. While the information listed here is correct, ECCC would like to clarify that the Horned Grebe Western Population is listed on SARA Schedule 1 as a species of Special Concern (since 2017), and so the Proponent must continue to comply with the conditions of the SARA as they apply to Horned Grebe.

#### ECCC Recommendation:

ECCC recommends that the Horned Grebe Western Population, which is likely to be encountered in Nunavut, also be considered a Species of Conservation Concern Known or Potentially Occurring at the Back River Mine within the Proponent's Wildlife Mitigation and Monitoring Program.

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

Sincerely,

Erik Allen  
Senior Environmental Assessment Officer

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