



Fish and Fish Habitat Protection Program
Arctic Region
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Programme de protection du poisson et de son habitat
Région de l'Arctique
301 – 5204 50th Ave. (Franklin)
Yellowknife, Territoires du Nord-Ouest
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Our file *Notre référence*
12-HCAA-CA7-00007

Your file *Votre référence*
12MN036

Nunavut Impact Review Board
Attn: Keith Morrison
Manager, Project Monitoring
P.O. Box 1360 (29 Mitik St.)
Cambridge Bay, NU X0B 0C0
Via email to: info@nirb.ca

Subject: Fisheries and Oceans Canada Comments RE: 12MN036 - B2Gold Nunavut Back River Project 2025 Annual Report

Dear Keith Morrison,

The Fish and Fish Habitat Protection Program (FFHPP) of Fisheries and Oceans Canada (DFO) received your request for comments on April 13, 2026. DFO has reviewed B2Gold Nunavut's (B2Gold) Back River Project (the Project) 2025 Annual Report in accordance with its mandate, specifically the management, protection, and conservation of fish and their habitats.

DFO-FFHPP is generally agreeable with B2Gold's reporting in the 2025 NIRB Annual Report and offers comments in the attached worksheet for the NIRBs consideration.

In addition, DFO-FFHPP would like to take this opportunity to summarize DFO's monitoring activities and major updates regarding the Project from the 2025 reporting year. In general, B2Gold was in compliance with their FAA and with the *Fisheries Act*.

- ***Fisheries Act Authorization (FAA) Amendment:*** DFO-FFHPP issued an amendment to authorization 12-HCAA-CA7-00007, to encompass the increased water withdrawal from Goose Lake and potential impacts to the Goose Lake Outflow. Monitoring, offsetting, and reporting requirements were also updated to reflect this change. Another amendment was issued shortly after to correct minor administrative errors.



- **2025 Site Visit:** DFO completed a site visit at the Back River project in September 2025. The site visit included inspections of Llama Lake, Rascal Stream West culvert and upstream, Rascal Stream East, Goose Lake pumphouse, and the Marine Laydown Area. The site was found to be largely compliant. The exception was observations of gravel deposition into Rascal Stream East, adjacent to the airstrip. DFO documented the issue while on site and B2Gold immediately removed gravel from within the stream and proposed a plan to monitor any potential impacts to fish and fish habitat - specifically Arctic Grayling migration - in spring 2026. B2Gold and DFO-FFHPP have been in continuous discussions on this topic.
- **2025 Scientific Data Collection:** The DFO-FFHPP staff were joined by DFO Science staff during the September site visit, who completed field data collection at Llama Lake to support an ongoing research project using fish-out data to inform habitat utilization and trophic structure of northern lake ecosystems.
- **FAA Annual Report:** DFO has received the 2025 FAA Annual Report, which summarizes project activities, impacts on fish and fish habitat, monitoring results, and overall compliance with the FAA and the *Fisheries Act*. DFO will begin its review of this report in the near future.