



Fifteen Mile Stream Gold Project – Environmental Impact Statement Response

Prepared by the Atlantic Canada Chapter of Sierra Club Canada Foundation
April 29, 2021

We appreciate this opportunity to submit our comments regarding the [Environmental Impact Statement for the Fifteen Mile Stream Gold Project](#).

We object to the proponent's proposal to develop an open-pit gold mine project at Fifteen Mile Stream, Nova Scotia.

Our objections are based on five major concerns, detailed below:

- 1. Impacts on water and wetlands**
- 2. Impacts on biodiversity**
- 3. Impacts detrimental to addressing climate change**
- 4. Lack of confidence that Atlantic Mining NS Inc. will comply with environmental regulations**
- 5. Impacts on the local environment**

1. Impacts on Water and Wetlands

We support the concerns raised by the Ecology Action Centre:

The proposed alterations to the natural water systems and water features are significant in both size and impact. For example, due to the mining activities, Atlantic Gold estimates that the local water table will not return to normal levels for 100 years.

Atlantic Gold is also proposing to realign Seloam Brook around the open pit. Seloam Brook will be realigned through the construction of a 1.6 km raised perimeter berm through an approximate 800m constructed realignment channel. If this should fail, not only will this be destructive to Seloam Brook and disrupt the local hydrological cycle, but fish habitat will also be lost.



In total, Atlantic Gold wants to alter 336 wetlands either completely or partially. 690,817.164m² of wetlands will be destroyed; this equates to the size of over 552 Olympic swimming pools.

Globally, over 64% of wetlands have been lost due to human activity, and as we lose wetlands, we also lose their incredible benefits and services that they provide to both humans and the natural environment. A GPI Atlantic study (2000) on Nova Scotia's water resource value showed that wetlands provide an estimated \$7.9 billion worth of benefits in ecosystem services to Nova Scotians annually. Given that the estimates for the operating phase of the Fifteen Mile Stream is 7 years, we do not believe that these direct impact of mining activities, and additional indirect impacts, are appropriate or justified.

Atlantic Gold argues that other suitable wildlife habitat exists in the proposed site and in the surrounding area. We are concerned that the destruction of wetlands and the subsequent construction and mining activities that will take place at the site will have direct and indirect impacts on these species at risk and the overall local ecosystems and biodiversity.

One of the many ecosystem services that wetlands provide is absorbing excess precipitation and storing it for future use. We know that climate change is already impacting our weather patterns and resulting in increased precipitation. **Please detail how the significant loss of wetlands might lead to an increase in flooding in the area. Please include a map from an expert that can show which communities and ecosystems could be impacted by flooding. How will the proponent use the precautionary principle to mitigate or avoid this risk?**

2. Impacts on Biodiversity

The area of the proposed mine site is rich in wetlands and biodiversity. In light of the sixth mass extinction, we sincerely hope that our provincial and federal governments will not permit the destruction of habitats and their inherent biodiversity.

Please explain how each of the eight species at risk observed within the site footprint would be protected. The area is home to Blue Felt Lichen, Mainland Moose, Olive-sided Flycatcher, Evening Grosbeak, Eastern Wood-pewee, Rusty Blackbird, Canada Warbler, and Common Nighthawk.



Allowing this development would contravene Nova Scotia's Wetland Conservation Policy: the wetlands with Blue Felt Lichen are classified as Wetlands of Special Significance, and therefore, are not eligible to be altered or destroyed.

We feel that the proposed measures to protect species at risk will be inadequate and/or ineffective, as the Ecology Action Centre explains:

Nova Scotia's provincial lichen, Blue Felt Lichen, has been found at the Fifteen Mile Stream site, along with several other rare lichen species. However, Atlantic Gold states that this is not a problem, and that they will move the Blue Felt Lichen to another spot! Moving (translocating) a lichen and observing that it keeps surviving has not been accomplished in Nova Scotia before, and there's reason to think it would be unsuccessful (for the lichen). We are calling on the proponent to provide evidence as to why the lichen should be moved at all, and to reference research that translocating this lichen could be successful.

There were 28 observations of endangered Mainland Moose in and around the Fifteen Mile Stream site during site surveys. The proponent does not commit to avoiding known moose shelter sites that were identified by Department of Lands and Forestry. The company needs to do better than this given the multiple observations of this Endangered species and the dire situation the species is in!

Eighty-nine species of migratory birds were observed at the site, which makes it a fairly high bird diversity site. Of these, 16 species use intact interior forest, which is found at the site. Despite the known impacts to birds from noise and light pollution, not to mention direct mortality from collisions with vehicles and during site construction, the proponent states that with their mitigation strategies in place, there will be no significant adverse effect on birds! We will challenge this assumption.

3. Impacts detrimental to addressing climate change

Open-pit gold mines will be detrimental to our efforts to address greenhouse gas emissions (both provincially and federally). **Does the proponent feel that the loss of carbon sinks and increased carbon dioxide emissions are reasonable and responsible in light of accelerated climate change? Please explain why or why not.**



Please clarify how and to what extent the following factors could adversely affect climate change and our ability to cope with climate change:

- I. The loss of the local natural environment's ability to mitigate harms from climate change. For instance, to what extent might the significant loss of wetlands reduce the environment's capacity to lessen the effects of increased precipitation and more severe, more-frequent storm events?
- II. The activities associated with the mine site during both the construction and operations phases.
- III. The use of six million liters of diesel per year to operate the trucks for the Fifteen Mile Stream project.

We are also concerned that climate change impacts expected for Nova Scotia in the near future will increase the risks associated with these mining activities. For example, with the increase of precipitation and severe storms (e.g., hurricanes) expected in the province the risks associated with tailings ponds failures may also increase.

4. Lack of confidence that Atlantic Mining NS Inc. will comply with environmental regulations

Despite the proponent's claims of benefit to the environment, we are not confident that Atlantic Gold can/will construct and operate the proposed Fifteen Mile Stream Gold Project in accordance with the existing environmental regulations. Since the opening of the Touquoy mine, the province of Nova Scotia has already charged Atlantic Mining NS Inc. with 32 violations under Nova Scotia's Environment Act for "failing to comply with the conditions of an approval" and "releasing substances into the environment in amount, concentration or level in excess of approval level or regulations."

Given this troubling track record, we hope that the provincial and federal governments will not allow the proponent to construct or operate any further open-pit gold mines.

5. Impacts on the local environment

Emissions from the trucks and machinery, destruction of wetlands during construction, risks of transporting contaminated ore, impacts from dust and noise, and water waste from washing the trucks after each trip. These are among the ways in which the mine site and haul road would negatively impact the local environment. The trucks transporting the contaminated ore



to the Touquoy mine would drive past schools, churches, local businesses and hundreds of homes and cottages.

Additional questions

Section 1.6.1 of the Environmental Impact Statement claims, “The environmental benefits of the Project to Nova Scotia are numerous (page 70).” Given these, please also clarify:

- I. In what way does the proponent consider the loss of wetlands and their many ecosystem services to be beneficial?**
- II. In what way does the proponent view decreasing the biodiversity of the area – and in particular jeopardizing species at risk – as beneficial for the environment?**
- III. How does the proponent consider increased greenhouse gas emissions to be beneficial for the environment?**
- IV. In what way would permitting further open-pit gold mines from a company already facing dozens of environmental infractions benefit the environment?**

On behalf of the Executive Committee of the Atlantic Canada Chapter of the Sierra Club Canada Foundation, we object to the proponent’s proposal to develop an open-pit gold mine project at Fifteen Mile Stream, Nova Scotia for the listed reasons. We seek clarification on the above questions with the protection of Nova Scotia’s wildlife, habitats, and ecosystems in mind.

Thank you,

Tony Reddin and Emily Dodge, Co-Chairs
Executive Committee, Atlantic Canada Chapter
Sierra Club Canada Foundation