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April 26, 2021

Fifteen Mile Stream Gold Project
Government of Canada
Environmental Assessment Agency
Suite 200, 1801 Hollis Street
Halifax, N.S.
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To Whom it May Concern;

The St. Mary's River Association is a charitable, non-profit organization providing leadership and engaging partners to enhance, protect, and promote the St. Mary's River as a healthy ecosystem for Atlantic salmon and other native animals and plant species, as well as providing a rich community resource.

The SMRA is writing to express our concern with the scale of Atlantic Gold's proposed Twelve Mile Stream Project and to provide input on the scope of the Federal Environmental Assessment. Many rural areas have succumb to various human activities that have degraded the flora and fauna. There have been very few projects in Nova Scotia of the scale of the proposed Fifteen Mile Stream Open Pit Mine and many with a smaller scale and/or footprint have had negative consequences for the surrounding environment.

While the proposed "Fifteen Mile Stream" site is just outside the St. Mary's River watershed, it does create a potential precedent for mining in rural Nova Scotia and more particularly on or near the St. Mary's River. We understand the desire to utilize our natural resources for long term sustainable economic opportunities in rural Nova Scotia. However, we do not believe that a mine of this scale that only operates for a few years is a sustainable or wise use of Nova Scotia's natural resources.

Resource development like mining only provides short term economic opportunities, but healthy undisturbed wild areas provide sustainable long-term eco-tourism employment options. A mine that has a 400-hectare disturbed area and a pit that is 150m below ground level is not compatible with long term eco-tourism options and protecting biodiversity.

If the economic opportunity a mine can provide for a few years are deemed more important than the protection of Nova Scotia's natural resources and beauty, such activity must be selectively located where it will have the least impact on critical habitat and endangered species.

A search of past mining activity along the Eastern Shore shows that there have been numerous sites where gold has been mined and currently gold exploration is actively taking place at many sites. While no one has a crystal ball and can project where the price of gold will go in the future, it is not unreasonable to think that many of these former sites will be potential mine requests in the future. The government must act now before there are more requests for 400+ hectare sites. We must be selective, consider the environment, and say no to the locations that would have the greatest negative impact on the environment. Given the number of locations along the Eastern Shore where there is currently interest in Gold Mining, there needs to be a comprehensive plan that considers the entire area and not look at each site in isolation. The future and health of the entire Eastern Shore environment must be the most important consideration before another site is approved.

For any mine site, there needs to be comprehensive and transparent monitoring (before, during, and after any mine's operation) to determine its impact on the environment (soil, water and air and all flora and fauna that rely on it). This must include the provision for sufficient bonding to fully and completely mitigate any possible damage caused by mining activity at Fifteen Mile Stream.

We believe that the Federal Environmental Assessment should consider all aspects this mine request and in particular the environmental impact the mine could have on:

- The water table and ground water,
- a comprehensive study on the accumulative effects additional mining may have along the Eastern shore.
- the high and low water flow rates on all surrounding streams, tributaries, rivers, etc. and ensure minimum flows are maintained to meet the needs of all aquatic species,
- the impact water usage by the mine would have on area water courses,
- the impact a potential failure of any aspect of the mine operation could have on the surrounding water courses (while the Tailings Pond is a particular concern), air born and water erosion, leaching, etc. of the disturbed soil throughout the site should be addressed,
- the impact the mine activity could have on altering the drainage patterns feeding the surrounding watercourses,
- acid precipitation impacted soil and its ability to buffer the affects of the mining activity on the surrounding water courses, potential leaching of heavy metals, etc. could have on the flora and fauna,
- the impact dust and other airborne materials from the site and trucking activity could have on air quality and ground water, watercourses and the land surrounding the mine and along the trucking route between Fifteen Mile Stream and the Touquoy Mine,
- climate change and additional carbon must be considered,
- the need for sufficient bonding to fully and completely address any issues (including the unintended release of harmful material in surrounding soil and water courses) the mine could have on ground water, the water table, surrounding, land, streams & lakes, etc.,

Mining activity in Nova Scotia's Southern Uplands risks disturbing natural arsenic, mercury, nickel, cadmium and other metals. If there was a single spill or other event that released harmful waste or other materials to the surrounding land and watercourses, it would have a catastrophic impact and cause irreparable damage to fish, birds, animals, and plants.

Before a mine of any scale is approved, there needs to be sufficient bonding in place to adequately restore any damage that the mine or associated activity could cause and to fully remediate the site after all work has been completed. The cost to address environmental disasters where there has been some type of mine failure, has been in the hundreds of millions of dollars and if approved, Atlantic Gold needs to be required to provide sufficient bonding to repair similar failures and remediate such an event at Fifteen Mile Stream. No mine Operator can guarantee that acid mine drainage or pollution will not continue to occur long after the mine closes and some bonding must be held well after the mine closes to remediate any ongoing issues. We do not feel the level of bonding in for the Moose River Touquoy site is not anywhere near sufficient and any additional locations need to reassess these figures.

While the SMRA has no expertise in estimating the potential cost to address a major mine failure, an internet search pegged the cost to "clean up" Mount Polly at \$500m dollars. Clearly not every mine has this type of massive failure, but the taxpayers, area residents, or the public at large should not be expected foot this kind of bill. There are numerous examples in Nova Scotia where taxpayers have had to go in after a company shuts down and incur a multi-million dollar clean up bill. We should learn from past experience and require any proponent to provide sufficient bonding upfront to cover the worst eventuality. If it doesn't happen there could be a mechanism established to return all unused funds after the mine closes and all risk of environmental failure has passed.

A March 25, 2019 Atlantic Gold's news release estimated the Fifteen Mile Stream "proven and probable reserves" at 576,000 ounces and at an estimate value of \$1,800 (US) per ounce, the total value would be over one billion (US) dollars. Based on this level of revenue, it is not unreasonable to expect the proponent to fund the level of bonding required to cover the cost of a "worst case" failure like was experienced at Mount Polly.

I think it is important to also mention that Atlantic Gold currently has 32 environmental charges at one location. We can not risk additional environmental infractions near an Atlantic Salmon stream. This is a clear look at what we can expect at other locations and must be considered in this assessment.

Thank you for considering our input and we hope the mine is not approved. If the mine is approved, the Environmental Review Process must protect the area around Fifteen Mile Stream from irreparable damage that a mine such as Atlantic Gold's project could cause.

Yours Truly,

Scott Beaver
President, SMRA