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Valentine Gold Project  
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**Re: Environmental Impact Statement (EIS) for the Valentine Gold Project in  
Newfoundland – IAAC registry number 80169, NLDECCM registration number 2015**

**About MiningWatch Canada:** MiningWatch Canada is a non-governmental organization (NGO) created in 1999 as a co-ordinated public interest response to the threats to public health, water and air quality, fish and wildlife habitat, and community interests posed by irresponsible mineral policies and practices in Canada and around the world. We are supported by twenty-seven Canadian environmental, social justice, Indigenous, and labour organisations, collectively representing tens of thousands of members across Canada. Among other areas of work, we provide technical and strategic support to Indigenous and non-Indigenous communities, organisations, and governments across the country, and we have intervened directly in a large number of mining-related environmental impact assessments as well as working with community groups and experts on many others.

MiningWatch Canada contracted Jim Kuipers, P.E., to prepare the attached detailed comments on the Environmental Impact Statement for the Valentine Gold Project. Below is a summary of those comments.

### **Summary of Technical Comments**

- The EIS is highly premised on a conceptual prefeasibility level of project design detail, outlines, and other high-level technical information that does not allow for an accurate or complete analysis of the potential effects, or the mitigations that should be used to ensure those effects are prevented or at least minimized.
- The EIS is premised on there being no potential Acid Rock Drainage (ARD) or Metal Leaching (ML); as a result, no mitigation is proposed. However, if things do go wrong, because of this

assumption, no planning for that possibility will have taken place, making mitigation difficult and expensive.

- The EIS is also highly premised on a significant level of additional technical development and analysis in the future, as well as regulatory engagement, and any actual results and the subsequent project risks will only be borne out during those activities. While some more detailed evaluations are appropriate during later stages, the deferral of nearly all those activities is problematic.
- The proposed Tailings Management Facility for the project, as described in the EIS, is not consistent with the present industry standard of care as contained in the Global Industry Standards on Tailings Management (GISTM). If a gap analysis for the present project were prepared comparing it with the requirements of the GISTM, it would show where the project is significantly lacking in terms of the requirements overall and with respect to the EIS analysis.
- To the extent project details are provided, they are focused on the 12 year project life, and only cursory information is provided outlining the project Rehabilitation and Closure Plans, which should instead address *in detail* the potential impacts and mitigation necessary to address the post-mining project impacts in perpetuity, which if not addressed will eventually become a public liability.
- The level of progress shown in the EIS is indicative of an exploration company trying to become a mining company based on limited information and reference to future conformance to a set of standards or guidelines, rather than of an established mining company that has the institutional knowledge and ability to provide the level of information that it actually takes to do things right.
- Given the project characteristics as summarized above, the importance of well thought out and robust contingency plans, adaptive management plans, and financial assurance to provide the government with the funds carry out those plans if the project is abandoned – above and beyond the plans contained in the EIS – will be critical to offset the potential impacts from the proposed project.


Specific recommendations are included in the attached report.

In addition, we would like to note that the EIS does not indicate how sensitive the predicted economic viability of the project is, and the potential for operations to be suspended or ended at any point due to unfavourable market conditions; nor does it address the potential for the project's life (and environmental and socio-economic impacts) to be extended if additional mineral resources are identified and market conditions are favourable. These are critical factors in determining the potential long-term impacts of the project, including the potential public liability for monitoring, clean-up, and rehabilitation, and the corresponding financial securities required, should the proponent abandon the project at any stage.

Thank you for the opportunity to submit our comments. We hope they will assist the federal and provincial impact assessment authorities in ensuring that the Valentine Gold Project receives the most thorough, comprehensive, and rigorous review possible in the interests of real long-term sustainability for the region.

Sincerely,

<Original signed by>

 Jamie Kneen,  
Communications and Outreach Coordinator