



Summit Mine 14 Project
Impact Assessment Agency of Canada
Canada Place
9700 Jasper Avenue, Suite 1145
Edmonton, Alberta T5J 4C3
Telephone: 780-495-2037
Email: Mine14@iaac-aeic.gc.ca

Subject: Request for designation of Summit Mine 14, Reference Number 83917

I am writing to you today regarding the request for designation of the Summit Mine 14.

The Mining Association of Canada (MAC) is the national organization representing the Canadian mining industry, comprising companies engaged in mineral exploration, mining, smelting, refining and semi-fabrication. Our members account for most of Canada's production of base and precious metals, uranium, diamonds, metallurgical coal, and mined oil sands. MAC members strive to be responsible operators who are respectful environmental stewards, whose actions go beyond legal compliance. Their commitments are demonstrated through participation in *Towards Sustainable Mining* (TSM), a performance-based program whereby mining operations evaluate, manage and publicly report on critical environmental and social responsibilities, including facility-level performance in the area of biodiversity conservation management, water stewardship and climate change.

The *Impact Assessment Act* (IAA) is structured to apply to projects of a type listed in the *Physical Activities Regulations* (Project List). The Act also authorizes the Minister to designate as subject to the IAA a project that is not of a type or is below the threshold listed on the Project List. Based on experience with the use of the same provision under CEEA 2012 (one designation of a mining project based on the request of the proponent), MAC expected Ministerial designation to be used rarely and only in exceptional circumstances of federal jurisdiction.

The Project List categories and threshold were reviewed quite recently. We continue in our view that compared to other physical activities primarily in provincial jurisdiction, and their effects in areas of federal jurisdiction, mining projects are already disproportionately subject to federal assessment.

The routine use of Ministerial designation raises questions about the purpose of the Project List and undermines the predictability it was intended to bring.

I would therefore remind the Agency, as it considers the request for designation of Summit Mine 14, that the project does not present evidence of exceptional circumstances that would justify its designation and further erode the predictability of the federal assessment process.

<Original signed by>

Pierre Gratton
President and CEO