

Ecological Justice Working Group
Justice, Mission and Outreach Committee
United Church of Canada, Regions East

Submission to the Impact Assessment Agency Canada

July 7, 2026

Comments on *Summary of the Initial Project Description for
the 15-Mile Processing Hub Project (90533)*

By Ecological Justice Working Group, Regions East, United Church of Canada
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Thank you for this opportunity to comment on the Summary of the Initial Project Description (sIPD) of the 15-Mile Processing Hub Project by 15-Mile Mineral and Renewables Ltd., a division of St. Barbara Ltd.

The United Church of Canada has a long history of policies, documents, and submissions to public calls for input on social, environmental and ethical issues relating to mining issues. This submission is grounded in that extensive base of information.

In our work, we acknowledge the harmful role that past false assumptions of human separation from and superiority over the natural world has had in the commodification of nature and environmental destruction.

In gratitude for the richness of Creation, with growing awareness of the complexity of life-sustaining systems and our humble place as one species among trillions in this interdependent web of life, we acknowledge humanity's ability to do far-reaching damage.

The United Church policies clearly articulate humanity's fundamental integration with the rest of creation along with a call towards responsibility for the care of Creation.

Further, the United Church notes that such crucial understandings are at the root of the richness and wisdom of Indigenous worldviews. We draw your attention to the importance of that wisdom in assessing the 15-Mile Processing Hub Project.

INDIGENOUS SOVEREIGNTY AND RIGHTS

In the sIPD, the 15-Mile Mineral and Renewable Ltd. engagement activities with the Mi'kmaq are summarized.

The proponent, 15-Mile Mineral and Renewable Ltd. is not only to be seen carrying out engagement activities with Indigenous communities but must demonstrate that

- Indigenous sovereignty is being respected and will continue to be fully respected
- constitutional and legal frameworks are being strictly adhered to, including
 - Section 35 of the Constitution Act, 1982, which affirms Indigenous treaty rights;
 - the United Nations Declaration on the Rights of Indigenous Peoples Act (UNDA), which mandates free, prior, and informed consent (FPIC);
 - related landmark Supreme Court rulings
- Indigenous communities are being meaningfully informed, seriously consulted and fully involved in all decisions that affect their lands, resources, and communities
- the proponent's interactions with Indigenous people meet both legal obligations and the moral responsibility to uphold the principles of reconciliation.

The proponent must state and demonstrate throughout their material, that they understand the meaning and requirements of consultation, treaty rights, and the proponent's role and responsibilities as being Treaty People under the Peace and Friendship Treaties.

Importantly, a position of trust must be earned and maintained. In 2021, St. Barbara Ltd., of which 15-Mile Ltd. is a division, lost the trust of the Mill Brook First Nation, in part due to noncompliance with environmental regulations.¹

¹ Chief Robert Gloade, Mill Brook First Nation. Letter to James Millard Re: Millbrook First Nation's formal opposition to the Beaver Dam mine site. June 8, 2021
https://registrydocumentsprd.blob.core.windows.net/commentsblob/project-80111/comments-55794/Millbrook%20First%20Nation%20Letter%20-%20Atlantic%20Gold_Redacted.pdf

SCOPE

Transportation to the Processing Hub should have been included in the sIPD and it must be detailed in the proponent's impact assessment statement.

The sIPD does not include any information on the routes for transporting the ore from Old Austen Mine and Old Mitchell Mine to 15-Mile Mine. The sIPD does not provide potential impacts of such transportation under normal transport or in the case of incidents, accidents or deteriorating road conditions.

This project, involving a site-specific regional Processing Hub for the ore, by necessity must include a means of getting the ore transported from the region to be served (Old Austen Mine and Old Mitchell Mine) to the processing Hub site (15-Mile Mine). The ore would not be transported if it were not for the Processing Hub. Given the truck size and number of journeys, it is an impactful activity,

The statutory definition of designated project under the impact Assessment Act says that designated project includes any physical activity that is incidental to the project. The Processing Hub cannot fulfill its stated purpose unless the ore from Old Austen Mine and Old Mitchell Mine are transported to 15-Mile Mine.

The "Need" for this particular project is not sufficiently demonstrated.

"Need" is an important required component of impact assessments and the principle underpinning this requirement is that unless there is a demonstrable public need for a risky undertaking, it should not be allowed to proceed, and those impacts should be avoided.

The sIPD indicates a large number of extensive environmental and socioeconomic concerns that had already been raised for the sites in this Project. Each site risks major impacts on water in many ways and in various habitats, with negative consequences for life in the impacted areas. Additional details on all impacts will need to be included in the proponent's Impact Assessment Statement; however the sIPD is sufficient to conclude that the Project is a risky undertaking.

Many development projects offer local job creation, attract investment, contribute to provincial and national priorities and do not have severe negative impacts like this gold mining Project. The gold market is favourable so the proponent is keen, linking gold to 'all good things,' but there is no evidence provided that gold is a public need.

Therefore, the proponent must prove a demonstrable public need for the 15-Mile Processing Hub Project.

The information on Impacts is inadequate, in need of updating, or missing.

Throughout Sections 1.5, 1.6 and 1.7 the material from each Key Concern highlights the need for an Impact Assessment Statement from the proponent and the full IAA review process.

Information in Sections 3.6 Environmental Settings, 3.7 Socioeconomic Settings and 5 Potential Effects of the Project reveals the limited relevant information base at this time on impacts.

A Note on Alternatives

In Section 2.6 Potential Alternatives, the Standalone option of the three mines with processing at each deposit and the Hub option of 15-Mile Processing Hub are compared.

The Standalone option is the earlier proposed mining project. The proponent admits it has all these negatives: high overall demand for technical expertise; high capital intensity, high operational costs; large cumulative footprint, risks and disturbance area impacts of processing and TMF infrastructure at three mines; high GHG emissions and impacts; and requires surface water withdrawal.

The comparison does allow the proponent to remark on the changes made in the present Processing Hub proposal so it is seen as more acceptable comparatively. In fact, the Standalone option is irrelevant. Assessing the present proposal must not be influenced by this distraction.