



**Natural Resources
Office of the Minister**

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July 07, 2026

Impact Assessment Agency of Canada

Re: 15-Mile Processing Hub Project

We are writing in respect of the 15-Mile Processing Hub Project, a gold mining project in Nova Scotia proposed by 15-Mile Minerals & Renewables Ltd. (15-MMR).

Metal mining projects involving mineral exploration, extraction, and development, fall primarily within the constitutional authority of the Government of Nova Scotia and are subject to provincial regulatory oversight. This framework includes, among other requirements, provincial environmental assessment and Industrial Approval pursuant to the Nova Scotia Environment Act and Environmental Assessment Regulations.

The mining sector is important to Nova Scotia's economic future and strategic minerals continue to be in high demand.

The 15-Mile Processing Hub Project is a nationally significant resource development opportunity that aligns with Canada's objectives for economic growth, responsible resource development, and environmental stewardship. The project is projected to generate approximately \$5 billion in economic activity for Nova Scotia, create more than 1,600 construction jobs and nearly 1,000 operational jobs, and contribute over \$559 million in government revenues. In addition to its economic benefits, the project includes the remediation of historic tailings from multiple legacy sites, demonstrating how sustainable resource development can advance both economic and environmental priorities. Federal support for this project would help deliver tangible benefits to communities, workers, governments, and the broader Canadian economy.

Nova Scotia has recently updated its environmental assessment and Industrial Approval processes for metal mining to provide clarity, efficiency and predictability while maintaining environmental protection and meeting the duty to consult with Indigenous peoples. The changes are intended to support responsible natural resource development in the Province, while preserving rigorous review, permitting, compliance and enforcement requirements.

We acknowledge that Nova Scotia and Canada share responsibility for certain environmental matters that relate to mining. In this regard, we understand the project is a designated project for the purposes of the federal Impact Assessment Act. We are aware that an Initial Project Description (IPD) for the 15-Mile Processing Hub Project has been submitted to the Impact Assessment Agency of Canada (IAAC) by the proponent, 15-MMR. We further understand IAAC must decide whether a federal impact assessment of the project is needed.

Our respective governments have recently affirmed, in the Co-operation Agreement between Nova Scotia and Canada on Environmental and Impact Assessment, our mutual commitment to the goal of “one project, one review” to ensure a transparent, coordinated, efficient, and timely assessment process that contributes to a positive investment climate and promotes economic resilience.

The Co-operation Agreement states that, when a proposed project is primarily provincially regulated and subject to a provincial environmental assessment process, Canada may rely on Nova Scotia’s environmental assessment and regulatory processes, together with any required federal approvals, permits, and processes, to address adverse effects within federal jurisdiction where the relevant requirements of the Agreement are met.

Further, the Co-operation Agreement contemplates avoiding duplicative decision-making processes related to assessments by relying on provincial processes, together with other federal approvals, permits, and processes, where Nova Scotia confirms that provincial environmental assessment and regulatory processes will address potential adverse effects in federal jurisdiction – and direct or incidental adverse effects – that may be caused by the carrying out of the project.

Consistent with the Co-operation Agreement, the purpose of this correspondence is to provide information to IAAC about means that would allow Nova Scotia to address adverse effects within federal jurisdiction that may be caused by the 15-Mile Processing Hub Project. To this end, the attached table summarizes how each potential adverse federal effect (as defined in section 2 of the Impact Assessment Act) would be addressed through the provincial environmental assessment and Industrial Approval processes and/or through other federal approvals, permits, and processes.

We also attach, for your reference, guidance documents that further demonstrate the breadth of Nova Scotia’s robust regulatory framework for metal mining projects. This includes A Proponent’s Guide to Environmental Assessment (2025) and the Nova Scotia Class I Environmental Assessment Checklist and the Supplemental Checklist for metal mining projects.

As you will see, the scope of the Nova Scotia environmental assessment process is broad and includes consideration of potential adverse (and positive) project effects, including cumulative effects, on biophysical, social, economic, health, cultural, and heritage components of the natural and human environment, as well as the project’s contributions to greenhouse gas emissions and how climate change may impact the project.

Further, the provincial environmental assessment process ensures that Nova Scotians can share their views on projects that might affect them. At early stages of planning for an environmental assessment, proponents are expected to engage the Mi'kmaq of Nova Scotia and people from communities who may be impacted by the project, including individuals and groups that have been historically under-represented or under-served. Proponents are expected to detail their engagement efforts and how they have adjusted to respond to the information received in their environmental assessment documentation. The Nova Scotia Minister of Environment and Climate Change will consider concerns raised by the Mi'kmaq and the community and how these concerns have been addressed when making a decision on the environmental assessment for the project.

The Government of Nova Scotia also recognizes it has a duty to consult with the Mi'kmaq of Nova Scotia when contemplating a decision that could adversely impact asserted or established Aboriginal or Treaty rights. Formal consultation with the Mi'kmaq of Nova Scotia typically begins via the environmental assessment process and continues throughout the Provincial regulatory process on subsequent decisions and authorizations related to the project.

It is important to understand that, while the formal Registration stage of the provincial environmental assessment process is typically only 50 days long, Indigenous engagement and public consultation by the proponent in respect of a project typically commences long before Registration and the Province's consultation with the Mi'kmaq typically continues after the environmental assessment process concludes (including in relation to the Industrial Approval and other provincial regulatory processes). Nova Scotia's consultation is undertaken in accordance with the process outlined in the Terms of Reference for a Mi'kmaq Nova Scotia-Canada Consultation Process or directly with non-signatory communities.

Based on the information currently available, and subject to the completion of applicable provincial reviews, consultation, permitting, compliance and enforcement process, Nova Scotia confirm its provincial environmental assessment and regulatory processes will address potential Impact Assessment Act adverse effects in federal jurisdiction – and direct or incidental adverse effects – that may be caused by the carrying out of the 15-Mile Processing Hub Project.

Therefore, in keeping with the recently signed Co-operation Agreement, we respectfully request that IAAC consider relying on Nova Scotia's environmental assessment and regulatory processes, together with other federal approvals, permits, and processes, to avoid unnecessary duplication while ensuring that adverse effects within federal jurisdiction are appropriately addressed.

Regards,

<original signed by>

Tory Rushton
Minister of Natural Resources

Adverse Federal Effect	Nova Scotia Requirement	Comments
<i>Adverse effects within federal jurisdiction</i>		
non-negligible adverse change to <i>fish</i> and <i>fish habitat</i>, as defined in subsection 2(1) of the <i>Fisheries Act</i>	The Nova Scotia (NS) Environmental Assessment Registration document (EARD) must: • delineate and map watercourses and watersheds within at least 2 km of project boundaries (farther if necessary to encompass predicted effects); • describe potential changes to surface water quality and quantity at all project stages, as well as compliance criteria and how they will be monitored; • describe planned alterations to watercourses and any interaction between surface water, groundwater, and wetlands; • provide additional information on groundwater and wetlands, which would inform evaluation of potential pathways of effects to fish and fish habitat; • provide baseline information on fish and their habitats, including fish survey data and a description of habitat quality for each watercourse • describe potential effects on fish and their habitats, including impacts downstream; • consider and describe any predicted cumulative effects; and • provide mitigation measures for predicted effects. In addition, the EARD must describe: • potential for tailings pond water and runoff from all stockpiles (overburden, till, waste, ore, etc.) to affect groundwater aquifers and provide modeling of flow paths and contaminant transport that includes groundwater discharging to surface water; • mitigation strategies to limit groundwater effects from the tailings pond water and stockpiles; • potential impacts to human health and aquatic habitats; • how effluent discharge from the tailings management facility and collection ponds may impact nearby rivers, lakes, streams, and wetlands;	The NS environmental assessment (EA) process requires a comprehensive evaluation of the potential pathways of effect on fish and fish habitat, including consideration of potential changes in groundwater and surface water. This evaluation includes consideration of cumulative effects, mitigation (which may include habitat compensation and offsetting), and contingency planning and emergency response in the case of accidents or malfunctions. The Nova Scotia Industrial Approval also considers potential project effects on surface water quality and quantity. It is our understanding (from the IPD) that the project will require a federal <i>Fisheries Act</i> authorization, which is also expected to address the potential adverse effects of the project on fish and fish habitat. This federal permitting process normally includes Crown consultation.

Adverse Federal Effect	Nova Scotia Requirement	Comments
	• surface water runoff from all stockpiles (overburden, till, waste, ore, etc.) into nearby water regimes and potential impacts to human health and aquatic habitats; • mitigation strategies for any potential acid rock drainage and metals leaching; • tailings management facility runoff collection system, polishing pond, location of tailings pipeline, and how the design meets recognized industry standards; • dam classification and stability assessment; • stormwater management to ensure untreated effluent is not discharged; • the effluent treatment plant and the predicted effluent discharge limits that are protective of aquatic life; and • how the physical, chemical and biological quality of the disturbed land and water regimes will be reclaimed.	
non-negligible adverse change to <i>aquatic species</i>, as defined in subsection 2(1) of the Species at Risk Act	• See preceding row.	The comprehensive evaluation of the potential pathways of effect on fish and fish habitat, included in the NS EA process as described in the preceding row, will also address potential effects of the project on aquatic species. Additional relevant information will also be required for the provincial Industrial Approval process. It is our understanding that aquatic species potentially affected by the project would also be considered within the scope of the federal <i>Fisheries Act</i> authorization application review process.
non-negligible adverse change to <i>migratory birds</i>, as defined in subsection 2(1) of the Migratory Birds Convention Act, 1994	The NS EARD must, for fauna (which includes birds, including migratory birds): • provide baseline field data collected by qualified professionals that describes existing habitat types, plants, animals, and lichen; • present field data collected, including methods, timing, transects and surveyor qualifications;	Birds, including migratory birds, are included within the scope of assessment of fauna. The NS EA process requires a comprehensive evaluation of the potential pathways of effect on fauna, including migratory birds. This evaluation includes consideration of cumulative effects, mitigation, and contingency planning and emergency response in the case of accidents or malfunctions. The scope of

Adverse Federal Effect	Nova Scotia Requirement	Comments
	- describe the expected changes to plants, animals, lichen, and habitats due to project construction and operation; - provide additional information on air quality (including dust) and noise, which would inform evaluation of potential pathways of effects to migratory birds and their habitats; - provide data from the Atlantic Canada Conservation Data Center for the project area and delineate key habitats if present; - provide plans to avoid endangered and threatened species; - describe how baseline information will be used to inform an adaptive Wildlife Management Plan; - consider and describe any predicted cumulative effects; and - provide mitigation measures for predicted effects. In addition, the NS EARD must, for protected areas, conservation lands, and wetlands, which may serve as important habitat for migratory birds: - map the location of protected areas or conservation lands near the project; - describe predicted effects on protected areas or conservation lands; - delineate and map wetlands within at least 2 km of project boundaries (farther if necessary to encompass predicted effects) and describe any potential Wetlands of Special Significance; - provide functional assessments for all wetlands likely to be impacted; - describe efforts to avoid wetlands and potential Wetlands of Special Significance in the project design; - include any planned wetland alterations and planned wetland compensation efforts; - consider and describe any predicted cumulative effects; and - provide mitigation measures for predicted effects.	assessment also considers important bird habitats, like protected areas, conservation lands, and wetlands, as well as potential sources of sensory disturbance, such as dust and noise. It is our understanding that, If determined to be required for the project, a federal permit will be obtained pursuant to the <i>Migratory Birds Regulations, 2022</i> under the <i>Migratory Birds Convention Act, 1994</i>. This federal permitting process normally includes Crown consultation.

Adverse Federal Effect	Nova Scotia Requirement	Comments
non-negligible adverse change to the environment that would occur on federal lands	Not applicable – see comment.	Based on the IPD provided by the proponent, the project is not expected to result in adverse effects on federal lands, including reserve lands. This understanding remains subject to review through applicable assessment and regulatory processes.
non-negligible adverse change to the marine environment that is caused by pollution and that would occur outside Canada	Not applicable – see comment.	Based on the IPD provided by the proponent, the project is not expected to result in adverse effect on the marine environment inside or outside Canada. This understanding remains subject to review through applicable assessment and regulatory processes.
non-negligible adverse change — that is caused by pollution — to <i>boundary waters</i> or <i>international waters</i> , as those terms are defined in subsection 2(1) of the Canada Water Act , or to interprovincial waters	Not applicable – see comment.	Based on the IPD provided by the proponent, the project is not expected to result in any adverse effect on interprovincial, boundary, or international waters. This understanding remains subject to review through applicable assessment and regulatory processes.
with respect to the Indigenous peoples of Canada, a non-negligible adverse impact — occurring in Canada and resulting from any change to the environment — on:	See below.	See below.
(i) physical and cultural heritage	The NS EARD must: - describe work done to assess cultural and heritage resources; - include a summary of results and recommendations from the Archaeological Resource Impact Assessment (which must be provided separately); - assess Mi'kmaq heritage and cultural resources in the project area;	The NS EA process requires a comprehensive evaluation of the potential pathways of effect on cultural and heritage resources. ¹ This evaluation includes consideration of cumulative effects, mitigation, and contingency planning and emergency response in the case of accidents or malfunctions.

¹ The Mi'kmaw Archaeological Protocols published by Maw-lukutijik Saqmaq Assembly of Nova Scotia Mi'kmaw Chiefs defines Mi'kmaq archaeological resources as cultural landscapes, sites, features, and artifacts. The Nova Scotia *Special Places Protection Act* defines heritage objects as archaeological, historical, or palaeontological objects or remains.

Adverse Federal Effect	Nova Scotia Requirement	Comments
	- integrate the results of a Mi'kmaq Ecological Knowledge Study; - explain contingency measures to be followed if any artifacts are discovered during construction; - consider and describe any predicted cumulative effects; and - provide mitigation measures for predicted effects. In addition, the NS EARD must: - explain how the Mi'kmaq have been engaged, areas of interest, the issues they raised, and how their input is included in project planning, mitigation measures, or addressed in other ways; and - provide plans for ongoing engagement with the Mi'kmaq.	
(ii) the current use of lands and resources for traditional purposes	Included within the scope of the preceding requirements. In addition, the NS EARD must include information about potential project effects on fish, fauna, and flora, as well as air quality and noise, which supports the evaluation of potential effects on land and resource use.	
(iii) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance	Included within the scope of the preceding requirements.	
non-negligible adverse change occurring in Canada to the health, social or economic conditions of the Indigenous peoples of Canada	The NS EARD must: - describe potential effects on human health and safety; - describe predicted noise levels at all stages of the project and how they will meet applicable guidelines; - describe the potential positive and negative effects (both local and provincial), including: - jobs, economic opportunities and benefits to local areas, infrastructure, businesses, and recreation and tourism; - contributions to priorities like affordability, renewable energy, climate change goals, housing, and health care; and - potential effects on local homes or businesses;	The NS EA process requires a comprehensive evaluation of the potential pathways of effect on health, social, and economic conditions of Nova Scotians, including but not limited to Indigenous peoples.

Adverse Federal Effect	Nova Scotia Requirement	Comments
	- consider and describe any predicted cumulative effects; and - provide mitigation measures for predicted effects. In addition, the NS EARD must: - explain how the Mi'kmaq have been engaged, the issues they raised, and how their input is included in project planning, mitigation measures, or addressed in other ways; and - provide plans for ongoing engagement with the Mi'kmaq.	
Direct or incidental adverse effects		
non-negligible adverse effects that are directly linked or necessarily incidental to a federal authority's exercise of a power or performance of a duty or function that would permit the carrying out, in whole or in part, of a physical activity or designated project, or to a federal authority's provision of financial assistance to a person for the purpose of enabling that activity or project to be carried out, in whole or in part	In addition to the above, the NS EARD must include a broad range of information related to potential effects of the project on air quality, climate change, reclamation, geology, hydrogeology, soils, noise, and waste.	The scope of the NS EA process is broad and includes consideration of both adverse and positive effects, including cumulative effects, on biophysical, social, economic, health, cultural, and heritage components of the natural and human environment. Potential non-negligible adverse effects identified through the applicable review processes would be considered in accordance with provincial requirements and any applicable federal approvals, permits or processes.