

Fifteen Mile Processing Hub Gold Mining Proposal

I am writing in support of a federal environmental assessment for the Fifteen Mile Processing Hub mining proposal for the Eastern Shore by Fifteen Mile Minerals and Renewables.

There are **two reasons** for my position on this. **First**, although considerable environmental work has been completed by this company under other corporate names/entities, and by government reviewers for mines and processing facilities at these sites, the current proposal involving a central processing facility at Fifteen Mile Stream (now named Fifteen Mile Mine) with two satellite operations, involves a much larger operation at the Fifteen Mile site for which necessary environmental work has not been fully completed or reviewed by the public. All previous work under the federal Impact Assessment Act for 3 differently configured and separate operations was terminated in September 26, 2023. The public had actively contributed to all of these separate assessments but this work must be reviewed again in a much different context. Many of the potential environmental impacts involve the habitat provisions of the Fisheries Act so the rigour and balance of a federal assessment, involving the scientific expertise of federal departments needs to be applied.

My **second reason** supporting a federal assessment is the **negative compliance record of the company** which operated previously under the corporate name Atlantic Gold, at Moose River. (See 2, below)

1. Federal Environmental Expertise and Leadership.

The company had proceeded previously with separate environmental assessments for Beaver Dam, Fifteen Mile Stream and Cochrane Hill. **The increase in scale and change in operations to Fifteen Mile Mine, and therefore much larger environmental footprint at that site requires a full federal assessment which would apply to all component satellite operations**, keeping in mind that the company, not the government, chose to consolidate these mining sites into one corporate entity and therefore one environmental assessment process.

More specifically, previous environmental work on the Fifteen Mile, Cochrane Hill Beaver Dam sites identified significant concerns regarding **potential impacts on fish and fish habitat** including on important Atlantic salmon rivers of the Eastern Shore for which considerable restoration work has been undertaken for 40 years by the NS Salmon Association. Habitat Protection provisions of the federal Fisheries Act are an important trigger for federal environmental assessment.

With regard to the Fifteen Mile Mine proposal in particular, the proponent has concluded that fish habitat quality within the study area for the mining operations is predominately low and has proposed mitigation efforts have been developed in accordance with this assessment. The proponent bases this assessment on the presence of hydroelectric and water dams that have limited fish passage in the upper reaches of the watershed. They state the area is also degraded by historic mine works and the deposition of mine tailings, concluding there is no pathway for migrating anadromous and catadromous species. There are American eels throughout the East River Sheet Harbour watershed and Nova Scotia Power has installed an eel pass at the Governors Lake Dam at the very headwaters.

Fifteen Mile Stream does join a series of downstream flowages (Anti-Dam, Marshall, Malay Falls and Ruth Falls electric stations and water storage dams) to the Sheet Harbour estuary. Historically, there have been fishways but these are no longer maintained. The river system also hosted upstream stocking projects for recreational angling for Atlantic salmon and brook trout in the past. Nova Scotia Power has

an ongoing requirement by DFO to take Atlantic salmon that find their way into the fishway above the Barrier Dam, a requirement that has not been changed even though stocking projects have not been conducted in many years. The barrier dam at the Ruth Falls powerhouse head of tide where the salmon and trucking salmon has gone on since the mid 1990's, and a DFO designed fishway was installed at the Ruth Falls diversion dam when trucking of salmon was discontinued. Salmon are also trapped for counting at this site but there are also trout and gaspereau that use this old fishway. This is currently being rebuilt with an eel pass, a new lower section of the fishway and a redesigned downstream pass for eels and other fish, a project which should be completed within the month. Further, there is a contract out for the design of a fishway and eel pass at Marshall Dam and Malay Dam. There is a longer term plan to put eel passes and fishways in the remaining dams as they are refurbished to meet modern dam standards required by climate change.

Further, there are trout and eels throughout the watershed although their populations are low due to the acidity of the water, the legacy of acid rain. There is interest in liming the water to raise the pH as has been this has successfully improved the productivity of the West River Sheet Harbour plus it also captures CO₂. CarbonRun a new NS carbon capture technology firm, has built a test site at Ruth Falls.

The proponent's documents fail to acknowledge the extent and significance of this on-going work.

Nonetheless, the cumulative downstream effects of pollution from mining operations is still a concern for fish, fish habitat and, for drinking water quality for downstream communities, particularly in the event of a major accident or catastrophic tailings management facility failure.

The East River Sheet Harbour Watershed #53 shares the same marine estuary as the West River Sheet Harbour. The West River Sheet Harbour and Killag Rivers (West River Sheet Harbour Watershed #243) are the site of a significant Atlantic salmon and brook trout restoration project initiated and operated by the Nova Scotia Salmon Association, with the ongoing support of both federal and provincial governments and conservation stewardship organizations (Atlantic Salmon Federation, AFS). This project has been operating for several years. The project has provided evidence that Atlantic salmon are present in coastal areas on the Eastern Shore. It has documented that even though there are threats to salmon smolts both in the river system and in the estuary, 50% of smolts do return to the shared marine estuary. There has been extensive study of the salmon in the West River, electrofishing, counting fence and smolt wheel. The salmon population here is well studied both in the past and over the last 20 years. The Beaver Dam site is surrounding the NS Salmon Association's Killag lime doser site. There is no salmon in the East River with the exception of a few caught at Ruth Falls which are likely West River strays. But the population could be rebuilt.

Very recent studies involving acoustic telemetry (electronic tagging) followed by eDNA (environmental DNA) detection have further documented the presence of Atlantic salmon in the Sheet Harbour marine estuary. In the most recent scientific study, "Characterizing Water Chemistry and the Distribution of Atlantic Salmon on Nova Scotia's Eastern Shore, based on environmental DNA (eDNA)," the Nova Scotia Salmon Association concluded that the distribution of Atlantic salmon has remained relatively unchanged over the last 20 years. Salmon DNA was detected at 14 of 30 sites on the Eastern Shore including in the Sheet Harbour estuary.

The application of this eDNA methodology was been expanded to include a number of additional watersheds across Nova Scotia as part of the Nova Scotia Salmon Association's W.A.T.E.R. project

(Watershed Assessment Towards Ecological Recovery) as a basis for more restoration work. The project is focused on 5 key species at risk: Atlantic Salmon (Southern Uplands Population), Atlantic Whitefish, Atlantic Sturgeon (St. Lawrence population), Brook Floater and American Eel.

These recent studies have established that technologically-advanced detection methodologies are available for environmental assessment research and the detection of the presence of various aquatic species. This suggests a more **Precautionary Approach** should be taken by the Proponent regarding conclusions regarding assessments of fish presence and abundance.

The fact that the East River Sheet Harbour watershed joins the West River Sheet Harbour watershed in the same marine estuary where this restoration work has been underway, and the fact that the presence of anadromous species has been scientifically documented, should be acknowledged by the Proponent, particularly given the cultural and socio-economic significance of Atlantic Salmon and other anadromous and catadromous species.

In addition to Atlantic salmon and brook trout, it should be noted that the East River Sheet Harbour historic abundance series for American eels (COSEWIC Special Concern) is the longest available for the East Coast. This species was once the source of historic fishing effort for the Eastern Shore including the East River Sheet Harbour. Further, the Mi'kmaq have had a deep cultural and economic relationship with eels for food and for their skins. It should be noted that very recently the Mi'kmaq have indicated an interest in adding the lucrative elver fishery to their moderate livelihood fishery intentions.

2. Proponent's Compliance Record

A **second rationale** for supporting a federal environmental process for this mining project is the **compliance record** of this company operating as **Atlantic Gold** which operated a large open pit mine at Moose River on the Eastern Shore. Atlantic Gold was sentenced to \$250K in fines and penalties having plead guilty to environmental charges under the **federal Fisheries Act** and the **federal Metal and Diamond Metal and Diamond Mining Regulations**. The company repeatedly failed to collect effluent samples for **acute toxicity testing**, failed to report unauthorized deposits of sediment into fish-bearing waters. These infractions occurred between September 27, 2018 and April 29, 2020 so were not a one-time occurrence. Fish are the "canaries in the mine" for fresh and marine waters.

In conclusion, a **rigorous and precautionary approach aided by federal expertise and scientific resources needs to be undertaken to ensure that environmental impacts of this multi-site mining project are minimized. The environmental assessment process offers a systematic assessment of potential negative environmental impacts, both temporary and permanent, and ways of avoiding, minimizing or compensating for those impacts.**

It is hoped that the recent provincial addition of gold to the list of "Strategic Minerals" (gold for electronics, dentistry and finance, as currency or investment) will not fast track and therefore foreclose on a fulsome and thorough assessment of the environmental impacts of this vast area of the Eastern Shore resulting in otherwise avoidable or mitigated, permanent environmental loss.

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