BC Spaces for Nature's Submission to Impact Assessment Agency of Canada
RE: Berg Copper Project

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October 28, 2026

Impact Assessment Agency of Canada
1138 Melville Street, Suite 1800
Vancouver, BC V6E 4S3
Via Email: Bergcopper-bergcuivre@iaac-aeic.gc.ca

Subject: Comments on the Initial Project Description and Substitution Request for the Berg Copper Project (Reference Number: 90756)

To Whom It May Concern,

BC Spaces for Nature, a province-wide British Columbian environmental advocacy group with decades of experience in natural resource development, specifically regarding copper mining, is submitting concerns for the Planning Phase regarding the Initial Project Description for the Berg Copper Project and B.C.'s substitution request.

We express serious concerns over Surge Copper Corp.'s proposal for an open-pit copper-molybdenum mine southwest of Houston, B.C.

We urge the IAAC to evaluate the following key concerns:

1. Economic Feasibility
The global copper market is dominated by suppliers in Chile, Mongolia and China, who have significantly larger deposits and much lower production costs than Canada. Put simply, we cannot get close to competing with those mines without:

- seriously undermining our labour and environmental standards;
- providing massive subsidies such as for the construction of 150km of new transmission line.

2. Intact Ecosystems
The Nanika-Kidprice region features conservation values of national significance and high ecological integrity compared to nearby industrialized watersheds. This is no place for mines and associated infrastructure.

3. High-Risk Waste Storage and Water Quality
The project proposes massive earthen waste storage dams comparable to major B.C. facilities. These structures risk leaching heavy metals into local water bodies, posing a catastrophic threat to Nanika and Kidprice Lakes.

4. Downstream Impacts on Sockeye Salmon
Located in the Bulkley River headwaters, the mine threatens the Nanika River sockeye salmon population and water withdrawals from Nanika Lake.

5. Long-Term Regional Liabilities
Past northwest B.C. mines like Equity Silver and Granisle demonstrate a legacy of multi-century acid rock drainage and heavy metal contamination, undermining trust in long-term site mitigation.

6. Habitat Fragmentation
The industrial footprint encroaches on core Tweedsmuir-Entiako caribou habitat, an endangered species under the Federal Species-at-Risk Act. Further, it threatens moose and mountain goat populations.

7. Flora and Wilderness Integrity
The area supports endangered whitebark pine and borders the Nanika-Kidprice Park canoe route. This project presents an unacceptable degree of wilderness degradation.

Conclusion and Recommendations
Given these profound ecological risks, dubious economic prospects and historical regional liabilities, **we recommend rejecting this proposal in favour of more viable economic development, which is already underway in other mines across BC.**

Thank you for considering our submission.

Sincerely,
BC Spaces for Nature

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