

## Review of 'A Minerals Strategy for Newfoundland and Labrador' 2011

Overall the strategy is designed to promote mining and environmental protection is given too little attention and should be expanded..

Recommendations are capitalized.

### 1. ENVIRONMENTAL PROTECTION IS GIVEN TOO LITTLE ATTENTION AND SHOULD BE EXPANDED.

#### p. 21 Access to land for exploration.

While it is true that exploration results in a small physical environmental footprint the desire of the mineral industry to have unimpeded access to large land areas, results in the industry and the Department of Natural Resources exerting great pressure to ensure that land does not become alienated from present and future explorations. This has had a strong negative influence on the protection of land areas for ecological reasons, for example on the establishment of National Parks and the delineation of their boundaries (e.g. Torngat Mountains, Mealy Mountains and Gros Morne National Parks). Such pressure has probably delayed both the promulgation of the Ecological System Plan even though it was approved many years ago and the adoption of Endangered Species legislation.

#### P. 22

It is to be commended that a Natural Areas Selection Plan (NASP) is being developed and that the Province now has a Protected Area Strategy.

However, the only practical way 'to protect land for ecological reasons' and to balance it with mineral exploration's need for access to land, is to integrate the Mineral Strategy with the Protected Areas Strategy, so that existing and future conflicts can be discussed and resolved on their merits rather separately than on the basis of political influence.

### 2. THE MINERALS STRATEGY AND THE PROTECTED AREA STRATEGY SHOULD BE INTEGRATED.

It is apparent that the 'lands protected for ecological regions' are imbalanced and consist mostly of mountainous areas with high scenic values. However the costs of developing mines in such areas would probably be prohibitive, so they have been more readily exempted for exploration. Lowlands with ecological value such as the habitat of the Woodland Caribou (Lac Joseph and Red Wine) with mineral potential are under represented by protected areas.

## Mining

The extraction process has a much greater physical impact on the landscape than does exploration.

The adoption of a decommissioning plan for new mines as described in the Mining Act (2000) is greatly recommended.

However, the province has many old orphaned mines whose environmental impact is unknown and which should completely rehabilitated. What does partially rehabilitated (p.35) as applied to the Hope Brook Gold Mine etc. mean. I have heard that there is only a pool of water.

3. ALL OF THE OLD ORPHANED MINES SHOULD BE CATALOGUED, THEIR ENVIRONMENTAL PROBLEMS INVESTIGATED AND REHABILITATED, AS FAR AS PRACTICAL.

Pp34-35

The use of natural water bodies for the storage of reactive tailings is accepted by the Minerals Strategy but there is no discussion of alternatives.

This use of natural water bodies is antagonistic to the need to protect land for ecological reasons.

The Federal Fisheries Act states clearly that toxic material must not be dumped into waters containing fish. However, subsequent Regulations allow such action if the body of water can be listed under schedule 2. This measure was initially drafted to accommodate existing uses, but subsequently has been extended to allow current and future proposals for the use of natural water bodies as mining tailing ponds. The Duck Pond Mine in Newfoundland was the first new mine to be added to Schedule 2 in Canada, but has been followed since by up to 15 other proposals across the country desiring approval. Sandy Pond at Long Harbour has been approved even though the wastes will not be mine tailings, as such. All of these proposals would violate the Fisheries Act.

The generalization (p.35) that 'natural water-bodies may offer safer long-term storage than artificially constructed impoundments' is certainly not true, but will vary with circumstances and each will be different (Note the use of may).

Apparently the geological structure holding the body of water is not studied by the Mines Branch but by the Dept. of the Environment, if at all. It is questionable if this Department has the expertise to do a proper study.

Natural water-bodies are cheaper and save the mining interest money, but their footprint may be very large and amount to a permanent loss of a whole natural freshwater ecosystem. Other jurisdictions throughout the world have mandated the use of constructed impoundments.

Currently it seems the Province follows Federal decisions without any independent review of its own.

4. THE USE OF NATURAL WATER BODIES FOR TAILINGS DISPOSAL SHOULD NOT BE SIMPLY ACCEPTED BY THE PROVINCE. EACH PROJECT SHOULD BE REVIEWED INDEPENDENTLY ON THE BASIS OF ITS MERITS.

Currently Environmental Impact assessments do not require that the compensation plan for the proposal be part of the application. Compensation plans are developed after the permit is issued. As a result they are not usually given a rigorous independent review. Moreover compensation may be applied in any part of the Province and not necessarily in the system that has been adversely affected.

5. COMPENSATION AND MITIGATION PLANS SHOULD BE PART OF THE PROPONENT'S APPLICATION.

6. A number of terms are applied loosely. Their meaning should be elaborated and presented in the glossary.

'environmentally responsible '  
'environmentally sustainable'  
compensation (P.35)  
mitigation

D.H. Steele  
CPAWS - NL