

FISH, FOOD AND
ALLIED WORKERS

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DAVID DECKER
SECRETARY-TREASURER

Wednesday, April 13, 2011

Minerals Strategy Team
Provincial Minerals Strategy
Department of Natural Resources
P.O. Box 8700
St. John's, NL A1B 4J6

Dear Members of the Minerals Strategy Team,

On behalf of the Fish, Food and Allied Workers (FFAW/CAW) Union, I would like to provide feedback on the provincial government discussion paper, A Minerals Strategy for Newfoundland and Labrador.

The commercial fishery is very important to rural communities in Newfoundland and Labrador. As such, the FFAW/CAW understands the importance of the minerals sector for employment opportunities in rural areas of our province. Development of nonrenewable resources however should be sustainably managed to minimize environmental impacts.

While mining is predominantly a land based industry there can be impacts on our marine environment. The Hope Brook Gold Mine on the south coast of Newfoundland, the Burin Peninsula Uranium-Fluorspar Mine and blasting at the limestone-aggregate quarry on the Port au Port Peninsula are examples of sites conducting activities very close to the ocean. Fish harvesters have raised concerns regarding the impacts of these mining operations on fisheries resources and the marine environment in general.

The proposed nickel processing facility in Long Harbour will pump liquid effluent directly into Placentia Bay and dump toxic residue from the hydrometallurgical process into a nearby freshwater lake. While toxic residue in a contained pond may not seemingly pose any environmental problems, seepage of such toxic material into the soil and further into the groundwater is a noteworthy risk. As well, flooding may pose a risk. Toxic residue may work its way into the marine environment near the facility.

Any type of environmental contamination threatens the health of the ocean ecosystem and therefore the resources on which fish harvesters depend for their livelihoods. Specifically, toxicity and tainting of fish as well as habitat and food chain alternations could significantly affect fish populations and sustainability of the fishing industry over the longer term.

More transparency and greater stakeholder engagement throughout the process of exploration, development and production of mining projects is greatly needed in Newfoundland and Labrador. Companies and governments need to have adequate plans in place to assure the public that environmental impacts of these operations will be minimized and continuously monitored throughout

the lifetime of the project and beyond. Ineffective regulations and legislation have caused unnecessary destruction of our environment in the past. The Environmental Assessment process for companies to develop and produce their products must be more rigorous and involve consultation with all potential stakeholders in the project.

If the provincial government proceeds to capitalize on the employment and economic opportunities associated with the mining industry it must be balanced with sustainable development such that the environment is protected.

We look forward to future collaborative ventures with government, mining companies and other stakeholders to effectively work towards the development of A Minerals Strategy to benefit all citizens of Newfoundland and Labrador.

I thank you for providing an opportunity for the FFAW/CAW to comment on this discussion paper. If you have questions or comments please feel free to contact us at any time.

Sincerely,

A handwritten signature in black ink, reading "Earle McCurdy". The signature is written in a cursive style with a large initial "E" and "M".

Earle McCurdy
President