

**Submission to The Department of Natural Resources, Mines Branch. Comments from the Protected Areas Association of Newfoundland & Labrador (PAA) on a draft mineral Strategy for Newfoundland & Labrador. April 14, 2011.**

The Protected Areas Association of Newfoundland & Labrador (PAA) congratulates the Mines Branch of the Department of Natural Resources on the development of the first Mineral Strategy in our province. We appreciated the opportunity to bring forward our ideas and concerns at the recent works shop in St. John's. We do have some comments to make following that consultative process, which we hope was just the first in a continuing dialogue regarding issues surrounding mining and the environment.

As an environmental non-governmental organization (ENGO), our mandate is dedicated to biodiversity conservation and sustainable resource use in Newfoundland and Labrador. We work toward this goal by promoting the establishment of a network of protected areas that represents each of the unique natural regions of our province. We also support the establishment of marine protected areas.

We too, strive to balance the needs of the economy and our environment. We believe that without the environment, an economy could not exist. No single resource based entity should take precedence over another, especially in a day and age where organizations such as PAA strive to hang on to viable plant and animal species that are threatened and endangered in our province. Our province needs an economy that meets the needs of today, without compromising the needs of the future.

- We want to know that all alternatives to the disposal of tailings are considered, the end result being the least damaging to the environment.
- We want to know that protected areas and proposed protected areas will be safe from exploration.
- We want to know that a comprehensive list of abandoned mines will be completed in the foreseeable future, and a plan is put in place to deal with them.
- We want to know what the real percentages for staking and exploration are in this province.
- We want to know that your department supports the release of our Natural Areas Systems Plan (NASP) - the ONLY province in the country currently without one.

In order to balance the economy and the environment, it is essential to continue and maintain a relationship with communities, industry, key stakeholders (including ENGOs) and all other interested parties to engage and exchange information. We have a wealth of knowledge and expertise which can, if we allow it, help our province to make sound judgment in the best interests of the future of Newfoundland and Labrador.

PAA looks forward to reviewing the workshop document and ultimately the mineral strategy document, before its release, to ensure that it meets the needs of all interested parties. With full respect for the economic value that the mining industry provides, we are asking that you engage in a comprehensive management plan, and consider new approaches to sustainable mining, while continuing a positive consultative process. We

would also like to see a commitment from Mines Branch to work with the department of Environment and Conservation, to educate the mineral industry on the need to strike a balance between protected areas and areas open for development on the landscape.

The Government of Canada's "Green Mining" initiative is the application of sustainable development in mining that recognizes the non-renewable nature of minerals, but ensures that their extraction occurs in a manner that does not adversely impact the sustainability of the surrounding environment and communities. We hope that the Mines Branch strategy will correspond to this initiative.

Thank you once again for the opportunity to consult and provide comments.