

May 29,2008

Written Comments and Perspectives on:

The Proposed Carol and Scully Mining Projects, Proposed Additions to Schedule 2 of the MMER's.

Submitted by Judy Parkman (R.O.A.R.)

Submitted for consideration by Environment Canada.

These comments may be distributed to other participants on request.

Water a global perspective: Water is not only a significant Canadian Resource, but it is a life sustaining resource, necessary to meet the very basic needs of every Canadian. It is in significant demand from countries around the world, whether for industrial use consumption for mining, hydro, or a multitude of other industrial processes or to fulfill the demands for water use and drinking water consumption. There is ever increasing demand for this commodity. Canadians have the luxury of housing nine percent of the world's freshwater surface area and somehow this gives us a very misleading perception that these resources will last forever. Only in the last decade is this beginning to change. With this in mind we need to be increasing frugal with its use and consumption. We have a responsibility to make sure we approach this precious resource in a sustainable manner. Is the use of our natural water bodies as tailings disposal areas sustainable approach to this precious resource? I don't think so.

Schedule 2 Amendments: There is great concern in the environmental movement that the use of natural water bodies for tailings disposal areas will become the normal procedure. In 2002 the Multistakeholder Advisory Group (of which I was a member) was assured that additions to schedule 2 would be relevant to mines already disposing tailings into natural water bodies; operating or "historic" mines. While this is the case for the Carol and Scully mines, it isn't for a number of mines including the recent additions of Doris North and Meadowlands mines in Nunavut, Aur resources Duck Pond in Newfoundland (2005) and a number of other mines that are in the process of or proposing to be additions to schedule 2

Consultation shortcomings:

After the “Information” session regarding the schedule 2 additions of Doris North and Meadowbanks I commented on the need for “consultation” as opposed to an “information” session.

“To have regard to in deciding” as defined by the Canadian College Dictionary is one of the references given under consultation. It is disturbing to hear that the decision on this amendment to schedule 2 had already been made with the indication by an Environment Canada official that the (amendment) “will go ahead”.

Once again there has been very limited time to review the documents prior to the “consultation”, less than a week before the meeting is insufficient. Short timeline makes it very difficult for environmental groups to inform their constituents on significant issues, as requested by Environment Canada.

Iron Ore Company of Canada’s Carol Mine the sheer volume into Wabush Lake represents a significant loading of tailings to the area. The total estimated deposited tailings volume estimated at just short of 627,000 km³.
HADD:

While the tailings from the Carol mine into Wabush Lake are considered non-toxic and non acid producing; composed of sand, silica and fine iron. The sheer volume of tailings represents a tremendous toll on the aquatic environment much of which will not be compensated for as the HADD only applies to the most recent TMP. Surely there should be some consideration to HADD for the years where both mines had TA’s and we out of compliance (in the case of Wabush 20 for trout/daphnia combined 02/03.)

Wabush Mines EEM:

Environmental Effects Monitoring and habitat compensation:

According the presenter for Wabush Mines there hasn’t been any monitoring of Loon Lake. It’s absolutely essential to have baseline monitoring data on Loon Lake. I find it hard to understand how it can be decided that compensation for HADD through enhancement of Loon Lake is sufficient if an understanding of the current fish, benthos community and water quality/chemistry/analysis through baseline monitoring has not been done. How can a Compensation Plan be done without this knowledge ahead of time?

Again area of tailings coverage at around 2000 ha is significant, and only half the area has been revegetated.

Compliance:

Both mines are addressing the significant number of non-compliance violations issued for TSS in years past (fifty and fifty-two for Wabush and IOC respectively 02/03,) through the flocculation processes, but have the other non-compliance issues been resolved (acute lethality as mentioned above?)

After the last Schedule 2 amendment process I had asked what the significance was with regards to NAFTA (WTO), of a foreign owned company wanting to set up a mining operation (having already secured lease rights) and not being able to deposit tailings into a natural water body. Will we (Canada) be responsible financially for the loss of revenue due to excess costs for an alternative process, because of the company's inability to use natural water bodies for tailings disposal, now that we are setting precedent with allowing schedule 2 additions to the MMERs
I didn't get a full response to this at the meeting.

Representatives of the Environmental Community were not given responses to our questions and comments after the last information session on Doris North and Meadowbank. Can we be assured we will have responses relating to this consultation?

Lastly. Where is the Precautionary Principle in all of this? With serious uncertainties in regards to Global Warming and it's implications on permafrost, water levels and climatic variations should we not be extremely prudent in any activities (tailings disposal) that could compromise our precious water resources.

Thank-you in advance for responding to these comments, questions and concerns.