



Climate Change Task Force

UNAMA'KI/CAPE BRETON

September 5, 2023

To Whom it May Concern:

We are writing to express our opposition to the proposed sale of land by the CBRM to Halifax-Based Nova Copper, a sale that would allow copper mining in the Coxheath hills area. While we are encouraged by the recent decision of the CBRM Mayor and Council to table consideration of this sale, we believe that vigilance, oversight, and public input on any aspect of this process going forward are essential. Given the current state of regulations, we are extremely concerned that yet another environmental tragedy as a result of mining will occur and when the damage is done, it will be too late and the result may even be irreparable. Based on events in other provinces and countries, we are not sufficiently convinced that adequate measures are in place to effectively protect our citizens, other animals, or the environment in a relatively new copper mining landscape in Nova Scotia. Particularly in the context of our climate emergency, we feel that it is imperative that this process be halted in order to determine the potential costs to our community and province when selling our resources to private corporations. We fully support the efforts of representatives of our local organization Keep Coxheath Clean who are currently engaged in consultation with universities, government, elders in Unama'ki, and experts in the field calling for an independent review.

We are at a time when it is blatantly obvious that communities need to increase, not decrease, protections of sensitive rural land and the eco-system services these areas provide. In a context of climate change in particular, the protection of nature and other species is not a luxury or simply about keeping things beautiful for outdoor activities and tourism, it is fundamental to our ecological safety, security and adaptation efforts going forward.

Coxheath is home to a variety of species, including Canadian geese, ducks, fish, deer, foxes, pheasants, owls, eagles, coyotes, rabbits, and hobby farm animals. Water from the Coxheath Mountain feeds into local streams, brooks, Blackett's Lake, and Sydney River. The proposed mining boundary is only approximately 3 km from the Bras D'Or Lakes UNESCO Biosphere.

While we understand that the CBRM does not have the authority to make decisions about mining or related environmental issues, we are asking the CBRM to listen to their constituents, particularly the group representing 500+ citizens who requested the opportunity to have their voices heard about how this public land should be used and sold. As yet, they have not heard back from the CBRM. The motion to sell the "Beechmont Surplus PID Land" needs to be suspended until such time as a dialog can be arranged.

We understand that the Provincial government has ultimate control through the *Mineral Resources Act* over approval for the mine so we will also be voicing our concerns to them. We are not confident that the current regulatory framework will protect the watershed (on which the proposed mine area sits) from serious contamination since the regulations only appear to cover limits on suspended solids, not dissolved solids such as those that might contain arsenic or other toxic compounds commonly released during mining operations.

We recognize that the Federal government has regulations for mining-related toxins under the *Fisheries Act*. However, our understanding is that the release of these toxins is allowed up to a limit and the limit is self-monitored by the mine. As evidence from across the country and internationally makes clear, citizens cannot rely on self-monitoring by profit-motivated corporations. Safeguards, particularly in our harsh and varying climate, may not be guaranteed. From the regulations, Part 1 Sec 3: For the purpose of the definition of “deleterious substances” in subsection 34(1) of the Act, the following substances or classes of substances are prescribed as deleterious substances: arsenic; copper; cyanide; lead; nickel; zinc; suspended solids; radium 226; and un-ionized ammonia. Many of these are present and stored during mining.

We strongly advocate that the Province of Nova Scotia deny permitting further exploration and mining in Coxheath. We will continue to support the efforts of local citizens to halt this project and we hope to add to the voice of our local representatives in the CBRM calling for an independent review.

Please feel free to contact the Climate Change Task Force for assistance in accessing resources and experts that might shed further light on the implications of this mining project. We look forward to working constructively with parties who share a concern for protecting our local ecology.

Terry Gibbs

On Behalf of the Climate Change Task Force Coordinating Committee