



Amendments to the Metal and Diamond Mining Effluent Regulations for the Goldboro Gold Project - Comments from Ecology Action Centre

July 2024

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We have a leadership role in working on critical environmental issues, from biodiversity protection, to climate change, to environmental justice. We strive to equip human and ecological communities for resilience and build a world where ecosystems and communities not just sustained but restored.

Overall comments

While our specific comments below outline our thoughts regarding the amendments to the MDMER, it is important to note that the Ecology Action Centre does not support the Goldboro Gold Project. Gold mining creates negative social, health, environmental and economic impacts on local communities and the natural environment. The inevitable harms and destruction from tailings, depletion of aquifers, infilling, and other pollution simply put too much pressure on the life support systems.

Globally and locally, the gold mining industry contributes to the climate crisis and biodiversity collapse. In the face of these worsening crises, we desperately need intact ecosystems to be doing what they do best: sequestering carbon thereby mitigating the harm of greenhouse gases in the atmosphere, providing clean water and air for us and other living creatures, and supporting local biodiversity.

We do not need open pit gold mining as it is an unnecessary industry. Gold can be recycled infinitely, and there is already more than enough mined gold to meet the needs of humans. The Goldboro Gold Project also infringes upon Treaty Rights and threatens traditional hunting grounds and gathering areas of the Mi'kmaq. Local Mi'kmaq community members rely on these important lands for food security.

In addition, jobs and economic activity associated with the open pit gold mining industry only concern the short term. However, we must also consider the long-term negative environmental and economic consequences from the legacy of the toxic waste and destruction from open pit gold mines. Those working at the mine are needed in jobs that

move us all into a livable future. We need these skilled Nova Scotians to lend their efforts to adapting to climate change and reducing its impacts.

The work outlined in the Fish Habitat Compensation Plan should be completed, however this does not, and will not, balance out or compensate for the permanent damage to fish habitat and the other environmental, social and economic harms and threats that will be caused by the Goldboro Gold Project. **We call on DFO to not authorize the destruction of fish habitat for the purpose of gold mining, including this gold mine project.**

Specific comments on compensation plans

Goldboro Gold Project - Assessment of Alternatives for Tailings Impoundment Areas

This report is incomplete. There are at least 2 alternatives options for the project, which would affect the placement of tailings impoundment areas, that are not discussed or analyzed:

1. Underground mining – The proposal to commence gold mining again at Goldboro originally envisioned a portion of the mining to be done underground. See: <https://iaac-aeic.gc.ca/050/evaluations/proj/80340>, <https://novascotia.ca/nse/ea/goldboro-gold/>, and <https://www.cbc.ca/news/canada/nova-scotia/signal-gold-goldboro-gold-mine-environmental-assessment-1.6484234>

Underground mining would impact fewer watercourses (and wetlands). Underground mining also creates the possibility to “backfill” underground mining tunnels with tailings, a commonly used technique around the world, often considered more “green” way to manage tailings over the long-term. See: https://www.mdpi.com/journal/minerals/special_issues/backfill
<https://www.mdpi.com/2071-1050/15/17/12912>

Research on this approach to storing tailings underground was done in association with the *same company's mine* in Newfoundland:
<https://research.library.mun.ca/14850/1/thesis.pdf>

In the Assessment of Alternative analysis, why wasn't moving more of the mine operations underground, including storing tailings underground, discussed and evaluated?

2. Historic gold mining tailings – There are historic gold mining tailings at the Goldboro site from previous gold mining operations. Signal Gold may have an indemnity agreement, inherited from the previous project owner (Anaconda, previously Ores), shielding them from liability stemming from the historic tailings. See:



<https://www.halifaxexaminer.ca/government/province-house/public-paying-the-price-to-clean-up-old-gold-mines/>

The current site design may avoid the historic tailings for liability reasons, yet these areas with historic tailings could be disturbed if the company then remediates them.

Without considering using parts of the site with historic tailings present, not all alternative placements for the tailings impoundment areas or other site infrastructure have been considered.

