
The Ecology Action Centre's Comments on the Addendum to the Touquoy Gold Project Modifications – Environmental Assessment Registration

The following submission in response to the Addendum to the Touquoy Gold Project Modifications – Environmental Assessment Registration is on behalf of the Ecology Action Centre. The Ecology Action Centre is a member-based environmental charity in Nova Scotia; we are the province's oldest and largest environmental NGO. Since 1971, the Ecology Action Centre has been working at the local, regional, national and international level to build a healthier and more sustainable world.

The Ecology Action Centre does not support the proposed modifications. Gold mining creates negative social, health, environmental and economic impacts on local communities and the natural environment. It is also an unnecessary industry. Gold can be recycled infinitely and there is more enough mined gold to sustain the needs of humans globally. Importantly, Natural Resources Canada's list of critical minerals does not include gold. In addition, Atlantic Gold's proposed projects, including this proposal for modification at their Touquoy site, 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 and more; gold mining activities would severely damage these areas.

Below are our comments and questions about specific points in the Addendum, referenced according to page number.

Pg. 15- In Table 2.1, the proponent outlines % of Tailings Volume to be stored in the Touquoy Pit. This includes 100% of tailings from the proposed Beaver Dam site. Is the opening of Beaver Dam dependent on the approval of the Touquoy modifications? If so, why are these sites being considered under the Environmental Assessment process as two separate projects?

Pg. 17 – Please provide the actual rate of water treatment at the water treatment plant (do not refer to the CRA 2012 report).

Pg. 18- The proponent states that the treatment of effluent will be treated until Year 30. Who will be conducting this treatment? How often will this treatment take place and what is the scope of this treatment?

Pg. 19 – Water will be drawn off of the TMF and polishing ponds, creating a “near-zero discharge” environment from the TMF. Does this mean there will not be treatment of water coming off of the TMF after closure?

Pg. 32- The proponent writes that flows observed in 2021 were slightly higher than flows observed in 2019 and 2020 and had a similar response to precipitation events. According to Nova Scotia's webpage on [Climate Change Data](#), levels of annual precipitation in the province will continue to increase. Do the calculations of flows, precipitation, water levels and in the models provided by the proponent throughout the Addendum take into consideration the projected increases in precipitation?

Pg. 48- The proponent writes that 0.62 ha of Wetland 15 is proposed for alteration. Wetland 15 is a Wetland of Special Significance (WSS). The *Nova Scotia Wetlands Conservation Policy* states "Government will not support or approve alterations proposed for a WSS or any alterations that pose a substantial risk to a WSS, except 1) alterations that are required to maintain, restore, or enhance a WSS; 2) alterations deemed to provide necessary public function, based on an Environmental Assessment (if required) with public review or other approvals (e.g., Wetland Alteration Approval) as appropriate." Because this project does not appear to align with the exceptions outlined in the *Nova Scotia Wetlands Conservation Policy*, this wetland should not be altered by the proponent.

Pg. 56 – The proponent writes that the proposed modifications will not affect recreational users of the closest Wilderness Area. However, this statement is not properly justified. The proponent should provide rationale regarding how the modifications proposed could impact recreational users of the Wilderness Area, and how the proponent has determined that the potential impacts are not significant.

Terms and Conditions

If the Minister chooses to approve this project, the terms and conditions of the approval should include the requirement that all [terms and conditions issued for the mine back in 2008](#) should be completed BEFORE the modifications in 2022 commence. It is appalling that Atlantic Gold has not met all the terms and conditions issued in 2008 and is allowed to continue to operate, and even propose an expansion. It also shows that Nova Scotia Environment and Climate Change, and its Minister, are not serious about enforcing requirements that they issue.