

# Statement of Opposition

## Permitting of “Wet” Mine Tailings Impoundment Facilities in British Columbia and B.C.-Alaska Transboundary Watersheds

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**STATEMENT:** We, the undersigned, strongly oppose further permitting of wet mine tailings storage facilities by the B.C. Ministries of Energy and Mines, and Environment, and support other alternatives for safer, cleaner mining such as dry stack tailings storage.

**Recognizing the international significance of intact and productive wild salmon ecosystems, which are dependent on both healthy rivers and terrestrial environments, we call upon the B. C. Ministry of Energy and Mines to deny further wet-tailings permits, such as the one under consideration for the Red Chris mine. We also urge an immediate shift to safer alternatives such as dry stack storage systems for other proposed mines in B.C., particularly those in the B.C.-Alaska transboundary watersheds.**

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**When the Mount Polley mine’s tailings impoundment dam breached in August 2014, a twenty year old earthen dam that was supposed to last forever released almost 25 million cubic metres of tailings and waste water into B.C.’s Fraser watershed. That tailings breach has been described in the media as the “greatest environmental disaster in B.C.’s history,” and the “largest environmental mining disaster in Canada’s history.” Scientists are only beginning to grasp the magnitude of the environmental implications of this disaster. The event dramatically exposed the inherent risk of storing massive amounts of water and mine tailings in the headwaters of salmon rivers, and it has triggered a paradigm shift in thinking towards safer, cleaner mining.**

**An Independent Expert Engineering Investigation and Review Panel released a report on Mount Polley in January 2015 which found that unless significant changes are made in the way B.C. tailings dams are designed and maintained, more failures can be expected. The report’s principal recommendation calls for an end to wet tailings storage and conversion to filtered and dewatered “dry stack” tailings systems.**

**Despite this finding, however, just days after the Panel’s report, B.C.’s Ministry of Energy and Mines issued an “interim operating” permit for a wet-tailings storage facility at the Red Chris mine in northwestern B. C., in the headwaters of the transboundary, salmon-rich Stikine River. (The interim permit expires May 4, 2015.)**

**A**ccording to a report commissioned by Imperial Metals, the parent company of both Mount Polley and Red Chris, “any failure of the Red Chris impoundment will likely have a much more significant environmental impact than the Mount Polley failure.” The Red Chris mine will be much bigger, meaning it will produce a much greater quantity of tailings. The impoundment design and geological substructure closely mirror that of Mount Polley, raising fears about its integrity and safety. And unlike Mount Polley, Red Chris’ tailings will be acidic, creating a far bigger environmental threat. The Ministry’s rush to approve the wet tailings storage at Red Chris raises many concerns.

**B**ut these concerns are not limited to Red Chris. They also apply to other proposed mines in the transboundary watersheds, such as KSM in the Unuk and Nass River watersheds, Galore Creek in the Stikine watershed, and to the Tulsequah Chief in the Taku River watershed southwest of Atlin, all planning wet tailings systems. Plans to go forward with this outdated tailings technology put all downstream aquatic ecosystems and communities dependent on them at significant and unnecessary risk.

**W**e believe wet tailings impoundment systems constitute an unacceptable liability for future generations. A failure by the B.C. government to immediately stop further construction of wet tailings storage facilities, and transition to safer mining alternatives, would constitute a blatant disregard of its recent commitments to adopt “Best Available Technology and Practices” for tailings impoundments.

### **Rationale**

**W**e make this statement based upon the following considerations:

- **M**any wet tailings impoundment facilities are likely to eventually fail in some fashion, which would release a complex array of toxins, acid, and heavy metals such as mercury, arsenic, and lead into downstream ecosystems;
- **T**here is a close parallel between the design of the failed impoundment at Mount Polley and the tailings design at Red Chris, with both impoundments having substrata which has been identified as an engineering concern;
- **T**he Independent Review Panel of the Mount Polley failure recommended implementation of alternative technologies such as dry stack tailings technology in all future mines; and
- **B.C.** Minister of Energy and Mines Bill Bennett committed to implement all the Panel’s recommendations.

**W**e therefore ask the B.C. Minister of Energy and Mines to abide by his commitment to better mining practices, stop permitting wet tailings storage systems, and shift to safer alternatives throughout B.C., particularly in the coastal, transboundary watersheds.

Respectfully,

## Signers

### **Alaska Native Tribes:**

#### **Douglas Indian Association**

Juneau, AK

#### **Ketchikan Indian Community**

Richard Jackson, President

### **First Nations and Native Alaskan Associations:**

#### **United Tribal Transboundary Mining Work Group**

Co-chairs: Rob Sanderson, Jr., Second Vice President, Central Council of Tlingit and Haida Indian Tribes of Alaska and Carrie James, Tribal Council Treasurer, Ketchikan Indian Community

#### **Children of the Taku Land Protection Society**

Chantelle Hart, President, and Taku River Tlingit First Nation Citizen  
Whitehorse, YT

#### **Ketchikan Tlingit and Haida Community Council**

Rob Sanderson, Jr., President

### **Organizations and Associations:**

#### **David Suzuki Foundation**

Jay Ritchlin, Director General, Western Canada, and  
Acting Director, Science and Policy  
Vancouver, BC

#### **Rivers Without Borders**

Will Patric, Executive Director

#### **Trout Unlimited - Alaska Program**

Juneau, AK

#### **Sierra Club BC**

Bob Peart, Executive Director  
Victoria, BC

#### **Alaska Trollers Association**

Dale Kelley, Executive Director  
Juneau, AK

**West Coast Environmental Law Association**

Jessica Clogg, Executive Director  
Vancouver, BC

**MiningWatch Canada**

Jamie Kneen, Communications and Outreach Coordinator  
Ottawa, ON

**ForestEthics Advocacy**

Melyssa Hudson, Campaigner  
Vancouver, BC

**Dogwood Initiative**

Will Horter, Executive Director  
Victoria, BC

**Wilderness Committee**

Joe Foy, National Campaign Director  
Vancouver, BC

**Fraser River Sturgeon Conservation Society**

Vancouver, BC

**Canadian Parks and Wilderness Society, B.C. Chapter**

Bruce Passmore, Executive Director  
Vancouver, BC

**Friends of the Stikine Society**

Stan Tomandl and Ann Jacob

**Skeena Watershed Conservation Coalition**

Shannon McPhail, Executive Director  
Old Hazelton, BC

**Southeast Alaska Fishermen's Alliance**

Kathy Hansen, Executive Director  
Juneau, AK

**United Southeast Alaska Gillnetters**

Max Worhatch, President  
Juneau, AK

**Earthworks**

Aaron Mintzes, Policy Advocate  
Washington, DC

**SkeenaWild Conservation Trust**  
Greg Knox, MEM, Executive Director  
Terrace, BC

**Greater Southeast Alaska Conservation Community**  
Sitka, AK

**Watershed Watch Salmon Society**  
Aaron Hill, Executive Director  
Vancouver, BC

**Beyond Boarding**  
Tamo Campostamo, Director

**Friends of Misty Fjords**  
Ketchikan, AK

**Clayoquot Action**  
Dan Lewis, Executive Director  
Tofino, BC

**Salmon Beyond Borders**  
Juneau, AK

**Save Our Sky Blue Waters**  
Lori Andresen, President  
Duluth, MN

**Save Our Wild Salmon**  
Seattle, WA

**Valhalla Wilderness Society**  
Wayne P. McCrory, RPBio., Executive Director  
New Denver, BC

**Friends of the Clearwater**  
Gary Macfarlane, Ecosystem Defense Director  
Moscow, ID

**WaterLegacy**  
Diadra Decker, Board President  
Duluth, MN

**Grand Riverkeeper Labrador, Inc.**  
Roberta Frampton Benefiel, Vice President and Riverkeeper  
Happy Valley-Goose Bay, Labrador

## **Southeast Alaska Conservation Council**

Malena Marvin, Executive Director  
Juneau, AK

## **Individuals:**

### **Elizabeth May**

National Leader, Green Party

### **Adam Olsen**

Interim Leader, Green Party of British Columbia

### **Yvon Chouinard**

Founder, Patagonia

### **Dr. Wade Davis**

B.C. Leadership Chair in Cultures and Ecosystems at Risk,  
Professor of Anthropology Faculty Associate, Liu Institute for Global Issues,  
University of British Columbia

### **Monty Bassett**

Out Yonder Productions, Founder and Director  
Smithers, BC

### **Melanie Anastasia Brown**

Commercial Fisher  
Juneau, AK

### **Ray Collingwood**

Collingwood Brothers Guides and Outfitters  
Smithers, BC

### **Christopher Travis, DDS**

Secretary/Treasurer, North Coast Steelhead Alliance-USA  
Executive Producer and Host - Hooked on the Fly TV Series

### **Peter Tsigaris**

Member, Stop Ajax Mine  
Kamloops, BC

### **Reginald Dennis**

Tahltan Native Linguist

### **Mike and Stacey Abraham**

**Mickey and Becky Knight**

FV Starship  
Petersburg, AK

**Leanne Knowles and Jerome Farrell**

Members, Stop Ajax Mine and Kamloops Physicians for a Healthy Environment  
Kamloops, BC

**Anne Neave**

Member, Kamloops Area Preservation Association

**Ross Nichol**

Kamloops, BC

**Bill Hadgkiss**

Member, Kamloops Area Preservation Association,  
Farmer's Market "Too Close" booth coordinator, and  
Community Advisory Group alternate member

**Sharon and Richard Antoniak**

Members of Kamloops Area Preservation Association

**Matt Lubov**

Professional Sport Fishing Guide  
Cordova, AK

**Dr. Petra Kaufmann**

Medical Physician  
Winnipeg, MB

**Jake MacDonald**

Author  
Winnipeg, MB

**Dr. Jill Calder**

Physician and Director,  
Kamloops Physicians for a Healthy Environment Society  
Kamloops, BC

**Jay Van Oostdam**

Comox, BC

**Marilyn Puff**

Member, Stop Ajax Mine  
Kamloops, BC

**April Vokey**  
Professional Fly Fishing Guide  
Northwest BC

**Andrew Yarmie**  
Member, Stop Ajax Mine  
Kamloops, BC

**James Wentworth**  
Member of Kamloops Area Preservation Association  
and Kamloops Chapter of Council of Canadians  
Kamloops, BC

**Verna and Bob Cheramy**  
Concerned Citizens  
Kamloops, BC

**Debbie Woodd**  
Stop Ajax Mine supporter  
Kamloops, BC

### **Scientists:**

**Dr. David Suzuki, Ph.D.**  
Scientist, broadcaster and author,  
Co-founder David Suzuki Foundation  
Vancouver, BC

**Dr. David W Schindler, OC, AOE, DPhil, FRS, FRSC**  
Killam Memorial Professor of Ecology Emeritus  
University of Alberta

**Dr. Daniel E. Schindler**  
Harriet Bullitt Endowed Chair of Conservation  
School of Aquatic and Fishery Sciences  
University of Washington

**Dr. Jack A. Stanford, Ph.D.**  
Jessie M. Bierman Professor of Ecology and Director,  
Flathead Lake Biological Station,  
University of Montana-Missoula

**Dr. Jim Pojar, Ph.D.**  
Registered Professional Biologist (Association of Professional Biology of B.C.)  
Certified Senior Ecologist (Ecological Society of America)  
Smithers, BC



**Dr. Bindu Panikkar, Ph.D.**

Arctic Institute of North America,  
University of Calgary

**Dr. Gershon Cohen, Ph.D.**

Project Director, Campaign to Safeguard America's Waters  
Earth Island Institute  
Haines, AK

**Dr. Donald Reid, Ph.D.**

Conservation Zoologist, Wildlife Conservation Society Canada

**Dr. Mason D. Bryant, Ph.D.**

Certified Fisheries Scientist, American Fisheries Society  
Douglas Island Aquatic Ecology  
Douglas, AK

**Dr. Mark S. Boyce, Ph.D.**

Professor of Ecology, and Alberta Conservation Association Chair in Fisheries and  
Wildlife,  
Department of Biological Sciences,  
University of Alberta

**Dr. Craig Orr, Ph.D.**

Conservation Advisor, Watershed Watch Salmon Society  
Vancouver, BC

**Dr. G.F. Hartman, Ph.D.**

Retired, Department of Fisheries and Oceans  
Nanaimo, BC

**Brian Lynch**

Commercial Fishery Management Biologist, Retired, Alaska Department of Fish and  
Game  
Petersburg, AK

**Dale Pihlman**

Fisheries Biologist, Retired, Alaska Department of Fish and Game  
Ketchikan, AK

**Businesses:**

**Tatogga Lodge**

Teena Wright, Owner/Operator  
Iskut, BC

**Taku River Reds**

Juneau, AK

**The Boat Company**

Joel Hanson, Director of Conservation Programs  
Sitka, AK

**Blue Water Adventures**

Randy Burke, Director  
North Vancouver, BC

**Alaska Fly Fishing Goods**

Brad Elfers, Owner  
Juneau, AK

**Chinook Shores Lodge**

Jeff Wedekind, Owner/Fishing Guide  
Ketchikan, AK

**Hooked On Juneau**

James "Abe" Tanha, Owner/Operator  
Juneau, AK

**Outershores Expeditions**

Russel Markel, President  
Victoria, BC

**Un-Cruise Adventures**

Dan Blanchard, Captain/CEO  
Juneau, AK

**ArtChange, Inc.**

M. Jackson, Project Director  
Sitka, AK

**Small System Design Associates**

Jerry Smetzer, Principal Associate  
Juneau, AK

**Free Rein Guest Ranch**

Deborah Atha, Owner  
Bridge Lake, BC