



January 9, 2009

The Bras d'Or Lake Biosphere Reserve Association  
532 Chebucto St.  
Baddeck, NS  
B0E 1B0

Attn: Dr. Teresa MacNeil, Chair, Member at large

Dear Dr. MacNeil:

Re: Nomination Submission Bras d'Or Lake Biosphere Reserve

I am writing to you to express the concern of the Mining Association of Nova Scotia in relation to the November 18, 2008 draft nomination submission to UNESCO for the Bras d'Or Lake Biosphere Reserve.

Our organization has had an opportunity to review the document, view the power point presentation on your website and speak with other concerned people about this matter. As a result of this analysis I offer the following comments.

The mining industry in Nova Scotia contributes nearly \$480 million a year to the GDP and employs over 5000 people in combined direct and indirect jobs. The industry also pays the highest average wage of any other sector including tourism, forestry, manufacturing etc. Commodities mined include aggregate, crushed stone, salt, potash, zinc, dimension stone, gypsum and coal. The industry operates today under some of the most rigid environmental protection regulations in the country. New projects undergo a rigorous environmental assessment process that includes provision for reclamation together with the necessary bonding to ensure the work is carried out. In order to sustain our society and reasons for people to reside in this province, the orderly development of our natural resources is essential. In order for the mining industry to be sustainable, access to new reserves is critical as current reserves are utilized. Since new mineral deposits are discovered rather than previously known it is essential to have access to land for exploration and subsequent development. These deposits cannot be moved and therefore must be developed where they are in the best manner possible.

The concept of land protection for future generations is clearly accepted by residents of Nova Scotia as demonstrated in the requirement to protect 12% of the landmass within the next few years. The Mining Association of Nova Scotia supports this goal with the provision that the mineral potential of land is evaluated prior to protection. This has not been done to date in any serious fashion.

We note in the information provided by your Association that a UNESCO Biosphere Reserve designation would have no impact on existing land use activities or designations and should therefore be supported and endorsed by the "community". The Mining Association of Nova Scotia does not believe this to be the case as it can be demonstrated that in other areas similarly designated there are serious restrictions on economic activity within their boundaries. I find no evidence in your application to support your claim. To the contrary I note that one of the

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assertions in the application calls for no future exploration for oil and gas in the designated area. We all benefit on a daily basis from the products generated by mining activity and oil and gas production. Surely it is not prudent to jeopardize potential new reserves and the benefits we derive from them. Is it ethical for Nova Scotia to import such products from other countries where we have no control on how they are produced because we do not wish development here?

It is the view of the Mining Association of Nova Scotia that the most serious deficiency in the application process is that there is no evidence that a serious economic impact assessment has been carried out. Other than some general assertions that this designation will have no significant economic impact on the area there is no indication that this has been studied. The mineral potential alone of the area defined as the Bras d'Or Lake and watershed is tremendous. It is naive to think that the process of obtaining regulatory approval for a new mining operation within the "UNESCO Bras d'Or Lake Biosphere Reserve" would be likely or even possible.

In conclusion, prior to this application proceeding, the Mining Association of Nova Scotia believes that Cape Bretoners deserve a comprehensive economic impact assessment to determine the true impacts of this designation on Cape Breton Island and in fact all Nova Scotia. We would strongly recommend to the municipal units directly affected by this application to reserve support for this application until such a study is carried out.

Sincerely,



Gordon Dickie  
Past President  
Mining Association of Nova Scotia

Cc. Duart MacAulay, Warden, Municipality of the County of Inverness  
John H. Boudreau, Warden, Municipality of the County of Richmond  
Bruce J. Morrison, Warden, Municipality of the County of Victoria  
John W. Morgan, Mayor, Cape Breton Regional Municipality  
W. J. MacLean, Mayor, Town of Port Hawkesbury  
Blaine Gillis, CEO, Strait-Highlands Regional Development Agency  
Eileen Lannon Oldford, CEO, Cape Breton County Economic Development  
Authority  
Scott Swinden, Executive Director, Department of Natural Resources