



May 31, 2008

Protected Areas Branch
Nova Scotia Environment
Box 442, 5151 Terminal Road
Halifax, Nova Scotia B3J 2P8
By email: protectedareas@gov.ns.ca

Re: Ship Harbour Long Lake Candidate Wilderness Area

I am pleased to submit comments with regard to the Ship Harbour Long Lake Candidate Wilderness Area on behalf of the Mining Association of Nova Scotia (MANS). The Mining Association of Nova Scotia represents over 150 members in all five areas of mining – exploration, discovery, development, production and reclamation as well as consultants and suppliers to the industry.

Let me assure you that our Association is committed to work in concert with government and other stakeholders to ensure that this parcel of land does indeed become a protected area in our province. We are pleased to be able to submit our thoughts on the proposed consultative process as well as the proposed boundaries of the area.

Further, we are engaged in ensuring that our province meets the goal of ensuring that “(2)(a) twelve per cent of the total land mass of the Province will be legally protected by the year 2015;” as outlined in the Environmental Goals and Sustainable Prosperity Act. We are also cognizant of the commitment of the government to “...adopt strategies to ensure the sustainability of the Province’s natural capital in the areas of forestry, mining, parks and biodiversity by the year 2010” as outlined in section 4(1)(u) of the same Act.

In terms of Ship Harbour Long Lake, MANS is pleased with the proposed consultation process including the use of the public newsletter to get the information out to concerned individuals and stakeholders. We are also happy to see the opportunity for individuals and stakeholders to meet with departmental officials to address specific concerns.

MANS will be setting up a series of meetings with Nova Scotia Environment officials to identify technical issues and look for solutions to our concerns. We will also be meeting with



Jacques Whitford who have been engaged to prepare to socio-economic analysis for the candidate area.

In terms of the proposed consultation process, we are pleased that public input will be accepted through Step 3. At that point, we would encourage the government to host a series of public meetings both in communities near the proposed area and in HRM so that all stakeholders would have an opportunity to express their views on the strengths and weaknesses of the candidate wilderness area.

The Mining Association of Nova Scotia maintains that a full mineral evaluation (boot and hammer on the ground) of the candidate wilderness area should be undertaken through the consultative process. We realize that this is a fairly labour intensive undertaking but feel that it is critical to ensuring that all economic factors are taken into consideration before designating the area as protected. MANS does have a number of ideas on how to accomplish this goal and looks forward to sharing them with regulators from both Department of Environment and Department of Natural Resources.

There are a number of long held claims in the Ship Harbour Long Lake Candidate Wilderness Area, some of which actually are in later phases of exploration and many in areas where mines operated historically. MANS believes that these areas should be further explored for the possibility of economic resources. We would propose that these limited areas be excluded from the protected area and that access to these districts be negotiated with regulators prior to the declaration of the final proposed boundaries of the protected area.

We are currently working with the Department of Natural Resources, Minerals Branch to unearth the historic economic information for these particular areas – information that would include dollar values of past exploration and the value of the minerals that were extracted over the years. Once we have this data, we will provide it to both the Nova Scotia Environment officials and Jacques Whitford.

There is also the issue of the possible loss of current claims when the candidate area becomes a protected area. We believe that unless claim holders are properly compensated for their claims, there should be some type of agreement put in place that would allow exploration to continue in the protected area. There are many unobtrusive ways to do this and we would be happy to work with government officials on how best to move forward with this matter. We maintain that any economic deposit in the candidate area can be developed in a responsible manner even after the protected area has been established. The environmental assessment process in Nova Scotia is comprehensive and will ensure that the mine development and operation are technically and economically sound.

Lastly, in terms of possible mineral exploration in the protected area, MANS must raise the issue of exploration for uranium. Since there is currently a moratorium on exploring for uranium in this province, we would ask that, once the moratorium is lifted, there be some mechanism to evaluate the potential of uranium in the area. This, of course, would be done in a most respectful manner to the other uses of the protected area. Again, we are asking for this consideration so that all Nova Scotians can benefit from all of the natural resources of the province.

One final point we would like to make is that the area north east of Scraggy Lake should be excluded from the protected area. This piece is separate from the main body of the

candidate area and has diminished ecological value. We, therefore, believe that this area should be outside of the final boundary.

I trust that these comments will prove helpful as we move forward with the designation of this candidate wilderness area. We, as an organization, look forward to continuing to work with the Department of Environment on the Ship Harbour Long Lake Candidate Wilderness Area in the hopes of participating in a formal announcement some time before the end of 2008.

Yours sincerely,

Michelle Landreville
Executive Director