



November 14, 2008

Natural Resources Citizen  
Engagement Committee  
Voluntary Planning  
1690 Hollis Street, Suite 600  
Halifax, Nova Scotia B3J 3J9

Re: The Future of Nova Scotia's Natural Resources – What We Heard, Draft Version 1

I am writing today on behalf of the membership of the Mining Association of Nova Scotia (MANS) in response to the invitation to comment on the first draft of the "What We Heard" document. As you are aware, MANS is a provincial organization representing over 100 member companies in all areas of mining - exploration, discovery, development, production and reclamation as well as consultants and suppliers to the industry.

I would like to begin by stating our very real disappointment that the Mineral Section (page 20 – 25) states that few individual industry workers participated in the process. I would suggest that this statement be removed from the document for a number of reasons as outlined here:

- Given that "registration" and speaking was voluntary at the public session, there is no real way to measure industry representation or participation;
- My participation alone was on behalf of the over 3000 individuals who work within the MANS membership;
- In the section of process, it is noted that meetings were heavily weighted in favour of industry attendance (can't really have it both ways); and finally,
- There are over 6300 Nova Scotians who benefit from the mining industry both directly and indirectly, who on a daily basis show their support for the mining industry in our province.

In terms of overall participation of the people of Nova Scotia, I would also suggest that caution be used in the reporting. As many of us know, there were many repeat participants at the public sessions (as evidenced by my participation), and I would hate to have your numbers skewed by this fact. It would be helpful to have the Committee quantify the participation rate, based on the population of Nova Scotia. This would help frame future discussion on public interest in the process.

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All of this being said, MANS does embrace the concept of increased opportunities for collaboration and would be more than willing to continue to participate in future projects undertaken by Voluntary Planning.

A second point of clarification that MANS believes is required concerns statements attributed to participants that are found throughout the document. First, there seems to be an imbalance of views expressed in the report. Many statements from representatives of our industry are not even recorded, leaving the balance to those who oppose mining. While we understand that this was perhaps the greatest challenge in putting the document together, we firmly suggest that statements supporting forestry and mining be added to the report. We also agree, as was suggested by a representative of the Ecology Action Centre, that some sort of quantification of statements should be included. To say that “comments included” truly does not give one any sense of popularity or frequency of comments.

In terms of participants’ statements, MANS, once again, expresses their strong distrust of interpretation of these statements. The document presents statements as truths when in fact, so many of those attributed to our industry are incorrect, misleading or simply wrong. It is simply not right to assume that if it is said, it is true. MANS continues to ask for the opportunity to meet with the Committee to ensure that they understand the mining cycle and the impact of our industry on the economic viability of Nova Scotia. We also would like the opportunity to refute some of the incorrect public comments made at the meetings that relate to the size, scope and impact of minerals in our province. These include comments such as exploration is a secret process, there is no “safe” way to mine, up front funds should be secured to restore sites, we should look at other ways to mine than open pit, etc. These examples highlight ignorance of the mining industry and confirm our *raison d’être* to help with getting the fact out to all Nova Scotians.

In terms of the comments presented, we simply cannot take the time to address each individually. We would simply ask that there be some type of disclaimer indicating that these comments are not necessarily factual and that those seeking more information contact our Association directly. MANS believes that this is critical to avoid further misconception of the mineral industry, particularly if this document is to be further disseminated.

Finally, MANS would like to make a few points with regard to the section on Uranium in the “What We Heard” document. I would be remiss if I didn’t mention that within a few weeks of starting with the Association in September 2007, I met with representatives of Voluntary Planning to inform them that the Minister of Natural Resources had indicated that this process would be used to vet opinions on Uranium exploration and mining. I indicated at the time that we, as an organization, would not be contributing to the discussion on this matter through this first phase as we did not want to detract from the real purpose of the consultation as described in the Terms of Reference:

“... conduct a process to involve citizens in shaping the future of these four key provincial natural resources.”

The key elements are, of course, forests, minerals, parks and biodiversity. I would mention that our Association and industry are dealing with our position on matters relating to Uranium and the nuclear energy cycle in many other ways.

Given this, I would ask that the statement on page 30 (paragraph 3) be either amended or modified to note that the mineral industry did not generally engage in discussion on Uranium throughout the public sessions.

“... overall the public input received as part of the Voluntary Planning natural resources process overwhelmingly indicated a desire to see the moratorium on uranium exploration and mining maintained and legislated.”

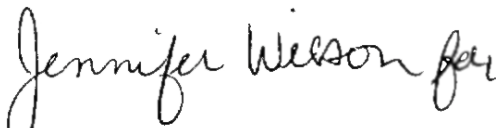
I want it to be clear that the Committee's interpretation to arrive at this conclusion is truly one dimensional.

I would also question the mention of the petitions. Have these petitions been properly vetted ensuring that all signatories are of legal age, alive and that there are no duplications? I would suggest that if they have not been validated, they should not be included in the comments.

In conclusion, the Mining Association of Nova Scotia reaffirms our commitment to working with all stakeholders to develop a natural resources strategy for the province of Nova Scotia. We thank Voluntary Planning and the Natural Resources Citizen Engagement Committee for their efforts to date and are open to further discussion with them as they move to finalizing their report. Feel free to contact us if we can be of further assistance.

Remember, if you can't grow it, you have to mine it.

Yours sincerely,



Peter Oram  
President



Michelle Landreville  
Executive Director