

Statement of Opposition

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

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.

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.)

According 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.

But 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.

We 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

We 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.

We 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

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Ketchikan Indian Community

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