global conservation concern have declined (in Canada) by an average of 42% between 1970 and 2016. Populations of Canadian species that are of national conservation concern have declined by an average of 59% between 1970 and 2016.

In the past few months, the U.N.'s International Panel on Climate Change has released three damning reports: Physical Science Basis (aka, "A Code Red for Humanity"), Impacts, Adaptation, Vulnerability (aka, "An Atlas of Human Suffering"), and Mitigation of Climate Change. Had there been any residual doubts about the seriousness or extent of the climate crisis, these reports would have provided a clear answer and perhaps even changed the course of history. But the truth is, it's not the scientific data that's lacking—it's the political will.

Given the perilous state of our planet, it would be highly irresponsible—nay, ludicrous—to permit these modifications and, in so doing, further imperil endangered species, infringe upon protected areas, contaminate rural watersheds, and endanger local communities.

We can no longer afford business as usual, in which any potential benefits are negligible and short-lived, but the adverse environmental and community impacts are significant and long lasting. As Sierra Club Canada Foundation wrote in response to the proposed Touquoy expansion:

It's never a question of if a new or expanded gold mine will contaminate the environment, but when, and for how long? [...] Further devastation of the local environment through gold mining expansion is compounded by the modern-day context: we are dealing with a climate crisis, biodiversity crisis, and more. As a number of lauded world leaders have proclaimed, we are also the last generation that is in a position to do something about it.

If you allow the modifications to the Touquoy mine, the damage will be reckless, entirely preventable, and squarely on your watch. Please, make the decision that will benefit all of us today and in the years to come: reject the proposed modifications to the Touquoy mine.

Sincerely,

To: <u>Environment Assessment Web Account</u>

Subject: Save Caribou Submission to Touquoy Mine Modifications Addendum

Date: April 21, 2022 11:38:11 AM

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Environmental Assessment Branch NS Environment and Climate Change PO Box 442 Halifax, NS B3J2P8 Email: EA@novascotia.ca

April 21, 2022

Dear NSE and CC Environmental Assessment Staff:

RE: Save Caribou response to Atlantic Mining NS Inc.: Addendum to the Touquoy Gold Project Site Modifications for Environmental Assessment

Please accept the following as Save Caribou's submission regarding Atlantic Mining Nova Scotia's Class 1 Environmental Assessment, for the Touquoy Gold Mine project modifications Addendum. We are reiterating some of the key issues and concerns we addressed in our submission to the proposed modifications to the Touquoy Mine dated August 16, 2021, and the failure of Atlantic Mining in responding to them in this report.

Mainland Moose Habitat

Our concern remains that the approval of the expansion of the Touquoy mine and the approval of the modifications will further destroy moose habitat. In our submission, August 16 we stressed that "Until candidate mainland moose core habitat has been identified for potential designation as such, as required by the *Endangered Species Act*, s.15 (4) (h), the province must not approve additional destruction of mainland moose habitat."

The moose in the project area of the Touquoy Mine are within the core habitat of the mainland moose. (NS-NRR 2021) Local residents have documented their presence there. In 2021, a new Recovery Plan for the Moose in Mainland Nova Scotia was released. (NS-NRR 2021). The extensive and recent research on the threats to mainland moose, especially those pertaining to mining, quarrying and roads is very well documented in this plan. (NS-NRR 2021, pgs .25-27.)

The Touquoy Mine Modifications report includes the Wildlife Management Plan, with the Mainland moose management plan from 2017. This management plan, developed in 2008, is outdated and inadequate. It vastly underestimates the severe threats to the moose population from this project and the project modifications. Atlantic Mining has made no attempts to adopt a new Wildlife Management Plan based on the updated Recovery Plan.

Save Caribou is recommending that the assessments and monitoring plans related to moose, moose habitat, the threat of destruction of moose habitat and the reporting be revised to reflect the research and relevant information in this recently released and comprehensive plan. It is our opinion that approval for the modifications for the Touquoy Mine not be given until this revision of the Mainland Moose Management Plan is rewritten and approved.

Rare Lichens:

In Save Caribou's submission of August 16, 2021 we expressed concerns about moving rare lichens by hand without providing evidence that this is a feasible strategy. We requested that 'the province require Atlantic Mining to purchase a significant tract of rare lichen habitat and donate it to a land trust or the Province to be protected'.

The addendum includes the lichen survey from 2021 however it does not address these concerns. It gives no new information on the proponent's plan for minimizing the impacts to these rare species, nor evidence that transporting lichen away from impacted areas would be an effective mitigation strategy. The addendum does not address this at all. Save Caribou is requesting, once again, as outlined above, that the province require Atlantic Mining to purchase a significant tract of rare lichen habitat and donate this land for protection.

Wetlands:

The presence of dead sphagnum moss due to silt and sediment in the wetlands is a concern. Sphagnum moss provides protection to the underlying watercourses. These bogs serve as huge storage depots for carbon and also remove toxic chemicals from water, thus helping to purify ground water. Drone imagery of these wetlands shows high rates of sphagnum moss mortality. Wetland 6...Year 1. The cover of sphagnum moss in good condition was reduced from an average of 87% in the reference quadrants to 13% in the affected quadrants.

This is imagery taken in 2019, before any modifications have been done. How will the processing of ore from 3 other mines and increased activity around these wetlands provide sustainability for these wetlands and the plant and animal life that depend on them? How can this be sustainable? Even though the proponent has a compensation plan for other areas this does not help with the destruction of the wetlands in the project area, especially the wetlands of significance. This is very concerning due to the fragile ecosystem of the whole project area.

How will these wetlands recover? Will the proponent be responsible for restoring these wetlands of significance? Why would this plan be acceptable to the province?

There are many outstanding questions and serious issues that have not been addressed by the proponent in the Environmental Assessment of the proposed modification to the Touquoy Mine. If approval for the modifications is granted, the exact terms and conditions of the issues listed below must be clearly laid out in advance with transparency as to how the proponent will be held accountable to the province of Nova Scotia.

- 1. There must be a new detailed reclamation plan for the entire footprint of the Touquoy Mine including the modification project area.
- 2. There must be a clear plan for closing new access roads when the proponent is no longer using these roads. This must include a detailed and approved plan for returning these roads to their natural state.
- 3. The proponent must be required to provide an updated and detailed Wildlife management plan to reflect the recent and comprehensive research now available from the Government of Nova Scotia Department of Lands and Forestry. This plan must acknowledge and assess the serious impacts and threats from the proposed modifications in core moose habitat as well as the dire threats to other wildlife species. The plan must include informed and specific monitoring and mitigation plans.
- 4. Beaver Dam, Fifteen Mile stream and Cochrane Hill gold projects are currently undergoing joint federal and provincial assessments. It is clear that all 3 projects are dependent on the use of the existing Touquoy Mine facilities for processing ore. It appears that the proponent's plan for the modifications at Touquoy is to open the door for these three mines. As this is only vaguely mentioned this information must be included and be consistent with all projects.

The original proposal and provincial approval for the Touquoy Mine was for the duration of 10 years. Now that the life span of that production is drawing to a close it is Save Caribou's opinion that a request for significant modification to the Touquoy Mine site is premature, considering that the three proposed areas for further development, Cochrane Hill, Beaverdam and Fifteen Mile Stream, have not received approval. To destroy and disrupt habitat, draw upon more resources and create an even bigger footprint on the landscape, is excessive and unnecessary. The fact that gold is not included in Canada's first Critical Minerals Strategy should be an even stronger disincentive for the proposed modification.

Save Caribou appreciates the opportunity for engagement and consideration of our concerns.

Sincerely, Save Caribou

To: <u>Environment Assessment Web Account</u>
Subject: Touquoy Gold Mine Site Modifications

Date: April 22, 2022 4:44:49 PM

Attachments: NSSA Touquoy Expansion Position.pdf

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To Whom It May Concern,

Please find attached the Nova Scotia Salmon Association's position paper on the proposed Touquoy Gold Project modification.

Sincerely,

Executive Director Nova Scotia Salmon Association Environmental Assessment Branch Nova Scotia Environment and Climate Change P.O. Box 442, Halifax, NS, B3J 2P8 EA@gov.ns.ca.



Re: Addendum to the Touquoy Gold Project Site Modifications Environmental Assessment Registration Document

April 22, 2022

Dear Tim Halman, Minister of Environment and Climate Change,

On March 23, 2022, Atlantic Mining Nova Scotia Inc. registered an Additional Information Addendum for environmental assessment of proposed site modification at its Touquoy Gold Project in Moose River, NS. The proponent refers to these changes as "modifications to the Approved Project that are required to support ongoing operation." The Nova Scotia Salmon Association (NSSA) believes this characterization is disingenuous, and that the proposed modifications are, in fact, positioning the company for undertaking a new operation at Beaver Dam and new operations at two additional sites in this region of Nova Scotia – all in Atlantic salmon watersheds (and two of which would impact the NSSA and our affiliates' largest, most successful restoration projects).

On December 11, 2021, the Nova Scotia Salmon Association (NSSA) submitted a response to the Full Revised Environmental Impact Statement for the Beaver Dam Mine Project, through the joint federal and provincial environmental assessment process. In that submission (posted https://iaac-aeic.gc.ca/050/evaluations/proj/80111/contributions/id/56480), we outlined our six major concerns about the proposal – including threats to fish habitat, and to the success of our ongoing habitat restoration work in that watershed.

According to the registration documents, the capacity of the Touquoy facility is currently ~6.8 million cubic metres. Given the stated total need of ~6 million cubic metres, the current capacity is sufficient to meet the needs of the Touquoy mine. This suggests that the proposed modifications are premised on launching the Beaver Dam project, which has not been approved, and is currently undergoing an environmental assessment. Until a decision about Beaver Dam has been made, no further environmental costs should be incurred. Habitat should not be destroyed or damaged in preparation for sites not yet approved.

By the company's admission, the original planned capacity at Touquoy was somewhat reduced to accommodate environmental impacts to sensitive habitats. What has changed? If the expansion being proposed now is both necessary and environmentally responsible, why was it not part of the plan under which the mine was approved and developed?

The proposed modifications at Touquoy appear to be a piecemeal approach to gaining approval for Beaver Dam. Allowing this to occur would compromise the integrity of the environmental assessment that is underway. This also holds for the Fifteen Mile Stream site, which is also under a joint federal and provincial Environmental Impact Assessment, and the Cochrane Hill site, currently under federal review.

If the actual purpose for this expansion in capacity is to provide infrastructure for additional mine operations, then the environmental impact of those additional mine operations needs to be outlined and considered as part of this assessment, or the expansion needs to be part of those other environmental assessment processes. The storage facilities cannot be split from the mine operations they support, as they are connected and dependant on one another, so the assessment of their environmental impacts needs to be jointly evaluated.

The NSSA remains deeply concerned about the likely environmental impacts of open-pit gold mining in Nova Scotia watersheds. Further, we are concerned about the extra risks associated with in-pit tailings storage – potential for groundwater and surface water contamination – and the long-term requirement for mitigation and monitoring, decades and decades after the proponent has moved on.

Given that this expanded capacity would only be needed if proposed additional mines sites are approved, the Minister's decision regarding this request for expanded capacity should be suspended and incorporated into the ongoing environmental assessment process associated with the proponent's other proposals.

Sincerely,

Executive Director

Habitat Programs Manager

Nova Scotia Salmon Association Unit 103, 321 Amesbury Gate Bedford NS B4B 0W8

To: <u>Environment Assessment Web Account</u>

Cc: <u>Nature NS Board</u>

Subject: Touquoy Gold Project Mine Modifications

Date:April 19, 2022 12:23:19 PMAttachments:NNS Touquoy final.pdf

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To Whom It May Concern,

Please accept the comments attached.

Sincerely



c/o Nova Scotia Museum of Natural History 1747 Summer Street Halifax, Nova Scotia B3H 3A6 naturens.ca

April19, 2022

NS Department of the Environment

To Whom It May Concern,

Touquoy Gold Project Site Modifications

Nature Nova Scotia represents twenty-three organizations and individuals who are concerned about the government sanctioning and ongoing degradation of Nova Scotia's natural environmental in order to produce private profits and a dwindling number of temporary jobs.

Nature NS wishes to render the following comments:

The continuation of this project and its use as a processing and dump site for material trucked from its proposed satellite mine sites at Beaver Dam, Fifteen Mile Stream and Cochrane Hill will have serious and long-lived environmental consequences.

This is not a project that can be called green or remotely appropriate within the emerging climate change imperatives identified by the International Panel on Climate Change. It will consume enormous amounts of energy, produce horrendous quantities of CO2, and leave a lasting legacy of toxic materials.

Sufficient gold has already been mined in the world to accommodate its use for any essential purposes that might arise. In Canada gold is not considered a critical metal.

This project will oust the endangered mainland moose from its wintering sites on the mine locations at Fifteen Mile Stream and Cochrane Hill. Good habitats have become rare in Nova Scotia after roughly five episodes of wholesale forest removals along the eastern shore over the past three centuries. Moose habitats remain a positive indicator for many other species that incorporate mature forest habitats as a portion of their needs.

The frequent, heavy hauling traffic essential to this proposed project will drive mainland moose that have already been displaced by human encroachment away from the challenged habitats they now occupy along the haul road.

Member organizations (representing more than 10,000 Nova Scotians):

Annapolis Royal & Area Environment and Ecology Group • Annapolis Waterkeepers • Arlington Forest Protection Society • Blomidon Naturalists Society • Cape Breton Naturalists Society • Eastern Shore Forest Watch • Friends of Antigonish Harbour • Friends of Blue Mountain—Birch Cove Lakes Society • Friends of McNabs Island Society • Friends of Nature • Friends of the Pugwash Estuary • Halifax Field Naturalists • Hope for Wildlife • International Crane Foundation • Margaree Environmental Association • Nova Scotia Bird Society • Nova Scotia Wild Flora Society • Protect Wentworth Valley • Save Caribou • Stop Clearcutting Unama'ki • Stop Spraying & Clear-Cutting Nova Scotia • Tusket River Environmental Protection Society • Young Naturalists Club of Nova Scotia



The Department of Natural Resources and Renewables has, by their actions over the past 20 years, written off the mainland moose in spite of its endangered status by allowing repeated, large-scale clearcutting of Crown land mainland moose habitat.

Given the province's own Endangered Species Act, the Department of the Environment has no need to adopt or extend that attitude.

If these modifications are approved, biodiversity will be further diminished in the few areas on the Eastern shore where healthy forests remain, like the one around Archibald Lake (Cochrane Hill).

The geologic implications should this project proceed will be well-covered by other commentators like the Eastern Shore Forest Watch Association, who are a member organization of Nature NS.

Nevertheless, it's obvious from a nature perspective, and should be voiced here, that chronic, long-term contamination from the Touquoy site will eventually drain downstream into the Ship Harbour Long Lake Wilderness Area, and onward to the sea.

This proposal will have disastro	ous effects on the	e natural world.	Please reject it.

Sincerely

On behalf of the board,

President, Nature Nova Scotia

cc. Nature NS Board

From: Eastern Shore Forest Watch Association
To: Environment Assessment Web Account

Cc: <u>Easter Shore Forest Watch</u>

Subject: Touquoy Gold Project Site Modifications Addendum - Comments of the Eastern Shore Forest Watch Association

Date: April 22, 2022 9:52:50 PM

Attachments: touquoy EARD addendum-ESFWA comments.pdf

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Dear Sir/Madam

Please find attached our comments regarding the Touquoy Gold Project Site Modifications Addendum.

We would appreciate a confirmation that you received our submission. Thank you,

Treasurer, Eastern Shore Forest Watch



Education, action, alternatives for the long-term health of the Acadian forest ecosystem
www.forestwatch.ca Email: info@forestwatch.ca www.facebook.com/ESFWA

Touquoy Gold Project Site Modifications Addendum Registration Comments – April 22, 2022

The Eastern Shore Forest Watch Association is a community organization founded in 1998 to address forestry practices and environmental issues that affect the health of the forests, wildlife, and human inhabitants of Nova Scotia's Eastern Shore. We have been engaged with environmental assessments of Atlantic Gold projects since 2007. These are our comments on Atlantic Mining Nova Scotia's addendum to the Environmental Assessment Registration for modifications to the Touquoy Gold Project.

We are pleased that the Minister has requested a third-party expert review of the ground and surface waters modelling presented in the Environmental Assessment Registration. This expert review is very thorough and raises some of our questions regarding the EARD. We recommend that the third party be asked to review Atlantic Mining Nova Scotia's (AMNS) responses in this addendum.

IN-PIT TAILINGS DISPOSAL

AMNS goes to great lengths to 'clarify' that the 'modifications' of the Touquoy mine site currently under review stem from the company's need to expand the WRSF and to use the exhausted mine pit to store tailings from the Touquoy mine itself. This rationale is misleading. In fact, it is clear in Section 2.2 of the Addendum and Table 2.1 that the primary use of the 'modifications' to the Touquoy mine site will be to store tailings from **not-currently-permitted** mines at Beaver Dam, Fifteen Mile Stream and Cochrane Hill. In fact, Touquoy ore processing is not the primary reason to ask for in-pit tailings disposal approval: "The Touquoy ore identified for processing and ultimate disposal in the Touquoy pit are medium grade and low grade. Highgrade ore from Beaver Dam would be processed on a priority basis before the low-grade ore from Touquoy" (last paragraph of Section 2.2, p.16). According to the original application, the Touquoy mine should be closing this year and remediation of the site begin. The changes in

use of the mine site and the considerably lengthened timeline are so drastic that they hardly can be called mere modifications.

We agree with the Nova Scotia Salmon Federation which stated in its social media post: "St Barbara Ltd (Atlantic Gold) is seeking Environmental Approval for expansion at its Touquoy Gold Mine - a next step in its bid to develop more mines in prime salmon rivers. While described as a site modification to address some need for current operations — the additional information provided by the company to NS Department of Environment and Climate Change shows this move is clearly about its aspirations to expand into the West and East Rivers of Sheet Harbour and the St Mary's. NSSA and ASF and many others are adamantly opposed to the creation of these mines at Beaver Dam, Fifteen Mile Stream and Cochrane Hill because of the risks posed to salmon, their habitat, and essential salmon recovery efforts."

GROUNDWATER CONTAMINATION

The effect is mostly considered for the Moose River which is closest to the pit and below its final fill elevation. However, as the water table flows underground and feeds streams and lakes through the water table, effects can also take place in water bodies downhill from the mine site.

"There is limited opportunity for transport through the overburden with the pit lake at elevation 108 m amsl or lower. As shown in the geologic cross-section (Figure 4.3 of Appendix D.1) the elevation of the contact between overburden and weathered bedrock at the location of the anticipated pit wall would be at about 108 m amsl or above. Additional drilling conducted in the fall of 2021, as reported in Appendix B.1 confirmed this relationship. Therefore, potential transport would occur primarily through the weathered bedrock units in the immediate vicinity of the pit." (p.26).

The geologic cross section also shows that the weathered/fractured bedrock extends from 4-6 m to about 16 m below the ground surface, which is the zone where the highest hydraulic conductivities have been measured (Figure 2.2, p.9), including the more recent supplemental measurements. Therefore, transport through the weathered bedrock is not necessarily less than through the overburden and will affect the Moose River via the groundwater table which intersects the riverbed by definition.

Figure 2.1, p.8 shows 8 faults oriented more or les northeast – southwest which intersect the pit and the course of the Moose River, three of which are primary faults (red). Although there is no definition of primary faults provided in this figure, the figures of Appendix B.3, indicate that those faults have hydraulic conductivities of 50 m/day or more, a very significant rate. These faults are a potential conduit for pit water and tailing pore water into the Moose River and in the water table below. AMNS states that "The results from updated groundwater flow and transport modelling do not substantively change the predicted groundwater contributions to

the assimilative capacity modelling performed for the EARD" (p.15). However, the effect of discrete features such as faults can hardly be modelled properly with a generalized model for the whole area surrounding the pit.

In the Response to Ministerial Information Request no. 8 (p.25), AMNS states that "Uncertainty in predictive model results presented in the EARD is mainly due to the density of available data in areas of potential impacts from mining operations; specifically, the area between the pit and Moose River and the area around the WRSA. Based on the additional work carried out in this area and subsequent updates to the model (Section 2.1 and Appendix B.3 of the Main Addendum Report), the certainty associated with modelling predictions has been increased".

However, the level of certainty is not stated. It is a reminder that, although models can be useful for planning purposes, they are an over-simplification of natural systems and their predictions are indicative at best. Model results are very dependent on input and assumptions. For example, the third-party expert review questions the attenuation of the concentration of contaminants along the flow path from the pit to the Moose River: "This is a questionable conclusion, as there would be almost no attenuation along such a short flow path of many parameters if the flow path is through largely inert till and bedrock" (p.5, Appendix C.1). Wood goes on to recommend "that the assimilative capacity report be supplemented with a scenario where there is no attenuation of contaminant concentrations in groundwater along the flow path be provided to support the attenuation rates predicted in the EARD" (p.6 Appendix C.1). IT does not appear that this scenario is considered in this Addendum.

Underground workings have the potential of being direct conduits for pit lake water and pore water to a much larger extent than faults, and it is in this addendum that we hear about them for the first time. Why were they were never considered earlier, when they must have been known from historical data? Moreover, these workings were certainly not incorporated in any model. **This is a blatant omission**. Appendix B.1 part B does not provide a cross section of these workings with depths (drawing 6 is "not to scale"), but they look like they extend at least down to an elevation of 60 meters, or about 48 m below the surface of the final pit lake. This represents a considerable hydraulic pressure and a water path to the groundwater table under Moose River and beyond. The other underground workings are not even shown in the 3-D model nor discussed. If these workings also extend to a 60 m elevation, they would be a conduit for pit water or pore water to the water table to the south of the open pit, and water bodies such as Scraggy Lake and the Fish River.

Mitigation

This Addendum finally proposes a plan to stop seepage of pit lake water into the Moose River, apparently sparked by the "discovery" of the historical underground workings of past mining. Although this is an improvement in the design, it ignores, again, the underground workings further east that can cause seepage to the south of the pit where elevations drop below the 108 m amsl elevation. The pit wall should be lined at and around those workings as well.

Fracture grouting is mentioned to avoid seepage through faults but only "if required" (p.14). There is no explanation of the criteria used to decide if it is required. This is very concerning. Without such criteria it is very easy to promise a mitigation and then say it was not required. In conclusion this document seems to give lip service to seepage mitigation but not take it very seriously.

PIT WATER FLOW INTO THE MOOSE RIVER

Upon filling of the pit, all mine effluent will be released into the Moose River, including water from the tailings pond and the waster rock piles. This will happen by overflow through the spillway. In other words, the pit lake will become part of the Moose River sub-watershed, in the Fish River watershed.

AMNS recognises now that water treatment of the pit water will be needed: "Treatment of effluent from the pit will be required to meet MDMER limits during reclamation. The pit was modelled to fill by Year 9 and treatment of effluent required until Year 30; the reclamation phase was simulated to occur in Year 3 -30. Water will be continuously treated from Year 9" (p.18). However, it seems that the focus of the treatment is arsenic and ammonia because modeling indicates that "the effluent concentrations of arsenic and ammonia are predicted to slightly exceed the 2021 MDMER discharge limit, therefore, arsenic and ammonia treatment will be required prior to release of the effluent to environment" (p.9, Appendix D updated). In fact, the model shows that there are "six parameters of potential concern with concentrations in the effluent predicted to exceed the WQOs presented by NSECC: aluminum, arsenic, cobalt, copper, nitrite, and cyanide" (p.14, Appendix D updated). However, no treatment is planned for these parameters, besides Arsenic and Ammonia: dilution by Moose River water beyond the spillway is the only mechanism considered to bring their concentration below the NSECC Water Quality Objectives (WQO). Such an approach is not acceptable and the water treatment should target these other parameters of concern.

Moreover, identification of the solutes of concerns is based on modelling with many input parameters: "Water quality modelling considered the pore water quality in the tailings and the groundwater inflow quality in the pit floor and walls, dilution from surface runoff, direct precipitation, and process water surplus, and the geochemistry of the individual water quality parameters" (p.9, Appendix D updated). These parameters can be very variable and we have no details on how some of them have been derived, particularly the geochemistry of individual solutes, despites the fact that "Wood further recommends that the proponent present information to validate predicted tailings pore water quality and predicted open pit lake discharge water quality against equivalent waters from the existing TMF" (p.6, Appendix C). The point is that other solutes of concerns may be identified depending on the assumptions made in modelling tailings pore water and pit lake water.

Rather than rely on modelling that is tentative at best, a chemical analysis protocol of pit water must be put in place that will monitor a wide range of parameters and solutes (which is not onerous with today's water analysis instruments). These analyses must be done at frequent intervals sufficient to have time to mitigate with water treatment on a timely basis. Indeed, the third-party review states: "Wood further recommends that trigger thresholds be developed that would initiate treatment studies should future monitoring or re-assessment of the pit lake models indicate that pit lake concentrations or groundwater flows from the open pit be higher than predicted in the EARD. Financial commitments for reserves to support closure of the open pit may also need to be revised" (p.6, Appendix C.1).

It is practically certain that mine site effluent will have to be treated for at least 20 years after the pit is full, and probably before it is full if it turns out that seepage through the pit walls causes contamination in surrounding water bodies. What is the likelihood that the company will take the responsibility to mitigate contamination from the site for such a long period of time? Will the company even exist after the mine is closed? Wood's recommendation that financial commitments for reserves be revised is very pertinent. The only argument in favor of the Touquoy and satellite mines is the creation of jobs of a few years. Such perceived economic benefits for the Province will be more than offset by mitigations, remediation and clean-up measures if their cost end up being born by public funds. As a point of comparison, the clean-up costs of only two of Nova Scotia's historical gold mines (Montague and Goldenville) have recently been estimated at \$60 millions (https://www.cbc.ca/news/canada/nova-scotia/contaminated-mine-sites-cleanup-cost-estimate-a-few-years-away-1.6286843).

SHIP HARBOUR LONG LAKE WILDERNESS AREA

AMNS finally recognises that the Touquoy mine is a threat to the ecological integrity of the Ship Harbour Long Lake Wilderness Area. The Wilderness Area being downstream from the mine, the concerns outlined above regarding ground and surface waters apply to the Wilderness as well. mitigation measures to reduce or avoid adverse effects listed on p.54-55 of the addendum are definitely necessary, although they will not eliminate completely adverse effects.

Monitoring

We find unacceptable that "No additional monitoring programs or surface water quality monitoring sites are proposed to specifically monitor effects on the Ship Harbour Long Lake Wilderness Area" (p.57). In the same way that there is presently a monitoring station at the outflow of Scraggy Lake because the tailings pond effluent is released into this lake, monitoring stations should be established at or before the boundary of the Wilderness Area to monitor water quality, not only "a new monitoring location proposed for Moose River downstream of the Open Pit spillway discharge location once the spillway becomes active (Year 9)". Monitoring of locations on the Moose River, on water course #13 and wetlands in between the mine and the Wilderness Area should start as soon as tailings are dumped in the pit, to establish a

baseline and detect potential groundwater contamination that seeps into wetlands, streams and lakes.

FISH AND FISH HABITAT

The Addendum document raises a number of issues regarding possible impacts of the project modifications on fish and fish habitat, Section 7.0.

Federal and provincial reviewers of the initial modification registration document had identified a number of areas of concern including possible impacts on: Square Lake, Upper Fish River, Watercourses 3, 13 and 14, and the Moose River. The Proponent was directed to conduct new fish and fish habitat surveys and fish sampling analysis for Square Lake and Moose River where the mine modifications pose a particular risk due to the adjacency of the open pit to the Moose River and the Waste Rock Storage Area to Square Lake as well as nearby watercourses.

The new aquatic surveys identified **seven species in Square Lake**: bandied killifish; brook trout; brown bullhead; Northern redbelly dace; stickleback; white sucker; and golden shiner. Two aquatic species were identified in the **Moose River**: white sucker and American eel, the latter designated as "threatened" by COSEWIC. It should be noted that elsewhere in the province, including four watersheds on the Eastern Shore, recovery plans for 5 species of conservation concern (including the American eel), are being developed under the Watershed Assessment Towards Ecosystem Health initiative, a project funded under DFO's Canada Nature Fund.

In addition, a review of all fish surveys completed at or near the Touquoy mine site conducted by the Proponent and used as evidence of no or limited impacts on fish and fish habitat were requested. This information was duly provided by the Proponent.

Further, a third-party review was requested with regard to water modelling work done by the Proponent to support conclusions reached that the modifications would have no or limited impacts on fish and fish habitat. This was carried out by Wood Environmental and Infrastructure Solutions.

In the Modifications document, the Proponent had claimed that there were "no noted changes associated with fish or fish habitat in **Square Lake, Upper Fish River, Watercourses 3, 13 and 14** from 'pre development conditions'". However, the Proponent acknowledges that the information for pre-development conditions is limited, essentially recognizing that base case information from the 2007 environmental approval was inadequate for tracking environmental impacts on fish and fish habitat. This constitutes a fundamental deficiency that needs to be addressed in tracking future environmental impacts resulting from new mining operations, if approved. Making sure this situation does not occur in the future is the shared responsibility of the Proponent and responsible government departments. The requests for additional information by government reviewers has addressed some of this deficiency.

Regarding **Square Lake** specifically, the Proponent determined that "no direct interactions were identified that could result in a measurable change in fish and fish habitat" (p.59). Indirect effects from groundwater seepage were identified as a potential effect but ongoing water quality monitoring at the outflow of the lake has not changed following development of the mine. Further, the October 2021 fish survey did not identify evidence of the effects of the mine on Square Lake. A similar conclusion was reached for the **Upper Fish River** in relation to the existing Waste Rock Storage Area. That the operations of the mine have not had a marked impact to date on fish and fish habitat in Square Lake and the Upper Fish River is encouraging, but the focus in the Addendum document should be on future possible impacts as well, in light of planned modifications.

With regard to **Watercourses 3 and 13**, the Proponent states that there have been reductions in the watershed area and associated flow greater that 10% from pre-development condition which may result in detectable effects to fish and fish habitat (runs to glides) resulting from likely reductions in water velocity, wetted channel perimeter, and habitat modifications, and accounting for likely changes in primary and secondary productivity. However, they state that there were no direct observable changes to fish habitat.

They acknowledge fish presence in these watercourses as well as **Watercourse 14** and estimate that approximately 2,941 m² of additional fish habitat will be altered, disrupted or destroyed as a result of mine modifications for which a DFO authorization will be required.

Avoidance, Mitigation, Compensation Measures

As with previous environmental assessments, the Proponent provides insufficient descriptive information about what measures they intend to take to avoid or mitigate these impacts to fish and fish habitat or how they intend to compensate for lost or altered habitat, only stating they will avoid or mitigate where possible or seek offsets from DFO in the context of a Fisheries Authorization process. These determinations, required by law, remain behind closed doors from the public and raise questions of transparency and accountability. Fisheries Act authorizations are only made public for government projects, not projects in the private sector. The public rarely hears about these regulatory requirements except in the equally rare case of violations and enforcement action. Recently, Atlantic Mining Nova Scotia faced three federal charges under the Fisheries Act as well as additional charges by the provincial government for work conducted for their mining operations on the Eastern Shore.

Third Party Peer Review

The third party (peer) review of water modelling conducted by Wood Environmental and Infrastructure Solutions and requested by government agencies raises a number of questions with regard to the proposed modifications of the mine to accommodate treatment of the remaining ore from Touquoy, as well as the proposed but not yet approved, Eastern Shore satellite mines: Beaver Dam, Fifteen Mile Stream and Cochrane Hill. Certain of these observations apply to impacts on fish and fish habitat.

With regard to the slight expansion of the **Waste Rock Storage Facility**, Wood states that the documentation provided to support groundwater modelling lacks sufficient detail to enable an in-depth review. They say that this limits an assessment of the potential effectiveness of the ditches which are the primary mitigation measure for the existing and expanded Waste Rock Storage Facility. Nonetheless, they conclude that additional mediation measures to address the current, pre-expansion seepage issues will be sufficient to also address impacts of the proposed modifications. They conclude that there will be no significant additional environment impact compared to the existing project.

With regard to the **use of the open pit for tailings management and eventual disposal,** they conclude that this is not expected to seriously alter the environmental impacts at a **regional scale**, i.e. within the Fish River Watershed. At a **local scale**, however, use of the open pit for tailings storage could introduce additional amounts of contamination to the Moose River upstream of its confluence with the Fish River, at the sub-watershed level. They describe this as a possible doubling of the environmental risk to the river.

Potential contamination of the Moose River

The Proponent assessed that the Moose River has sufficient assimilative capacity to reduce contaminant concentrations below applicable guidelines. They also state that they have contingency plans to batch-treat the open pit lake if it proves to be more deleterious than expected in order to meet government requirements and guidelines, if not always provincial Water Quality Objectives.

Little information is provided with regard to the plan and likely schedule for switching tailings treatment from the existing Tailings Management Facility to the open pit and the and the subsequent de-commissioning of the Tailings Management Facility in relation to ongoing treatment of ore from the satellite mines. Although it is true that de-commissioning of the TMF has already been approved by permitting, question remains on when and how the decommissioning will take place which are not addressed clearly in this Addendum document.

The third-party review recommends that the Proponent re-examine groundwater modelling work and provide additional details to support their conclusions of limited transport of potential contaminants from the pit lake to the Moose River through groundwater. They also recommend that the Proponent validate predicted pore water and discharge water quality in relation to the assumptions made regarding the assimilative capacity of the Moose River. This information is required to more fully understand the potential impacts on fish and fish habitat in the Moose River.

It is to be hoped that the additional research and assessment by third parties will be of great value to inform strategies for avoiding and mitigating potential impacts on fish and fish habitat from the operations of the mine, and for government regulators tasked with stipulating monitoring requirements as part of the permitting process should these modifications be approved despite their far-reaching consequences for fish and fish habitat. These studies also

identify consequential deficiencies in the Modifications document which must be addressed if impacts on fish and fish habitat in the Moose River are to be minimized.

MODIFICATIONS NOT DISCUSSED IN THIS PROPOSAL

Timeline

The modifications applied for in this EARD are changes in operations and footprint but do not consider or discuss the time factor. The original approval was for a mine that would stop operations this year. Now it is projected to operate ten years more. The result is that cumulative effects will increase in magnitude and reversible mechanisms will not start attenuating for another 10 years. **The implication of this expanded timeframe cannot be underestimated**. A few examples follow.

- A chronic low-level water contamination that does not kill fish outright but affects their life cycle and reproduction potential may be survived by a fish population if exposure is short, but if it lasts 15 years it can wipe out the population.
- Wildlife (birds, moose, other mammals for example) are displaced not only from the
 mine site but from the surrounding area because of noise, light etc. They can move to
 habitat further away from the mine, but that habitat is already occupied by other
 individuals, which means more competition and death because of limited resources.
 Again, if this lasts 5 years there is more likelihood that this temporary "overpopulation"
 may be survived by the displaced individuals than if it lasts three times as long.
- If a contaminant is accumulating by adsorption in soil or mineral precipitation underground (because of anoxic conditions for example), its amount will be larger after a longer period of time.
- ten more years of operation means ten more years of using sodium cyanide, lead nitrite, copper sulfate and other toxic chemicals, and releasing them or their by-products in tailings, water and air (hydrogen cyanide gas for example). This means ten more years of spills and accident risks, and of ongoing environmental stressors around the Touquoy mine site.

Although consequences of modifying the operation duration are not even mentioned in the EARD and its addendum, they are critical in the evaluation of environmental effects and the wisdom of extending the life of the mine.

Greenhouse Gases

Green house gasses are not considered in the modifications EARD beyond vehicle emissions. However, AMNS has estimated that the processing of the Beaver Dam mine ore at the Touquoy mine site will release 13,560.8 tonnes of CO₂ equivalent per year (Beaver Dam Mine Project Environmental Impact Statement Summary, October 2021; https://iaac-

aeic.gc.ca/050/documents/p80111/141952E.pdf). This amount is equivalent to the average yearly emission of 1000 Canadians (average per capita emission in 2020 is 14.2 t; https://ourworldindata.org/co2/country/canada). In other words, if Nova Scotians managed to reduce their individual GHG emissions by 20%, the efforts of 5000 people would be reversed by the mine emissions. Presumably similar emissions would result from the processing of low-grade Touquoy ore, which represents more than half of the volume of tailings proposed to be stored in the open pit (table 2.1, p.15). In assessing the impacts of lengthening the operations of the Touquoy mine by ten years, the resulting GHG emissions cannot be ignored.

CONCLUSIONS

We continue to question the wisdom of allowing the Touquoy mine site to expand for the purpose of dumping tailings from other gold mines across the Eastern Shore.

Despite statements to the contrary, the negative effects of the Touquoy mine on the environment will be significant and, in some cases, long-lasting. The mine will cause at a minimum chronic contamination of the watershed downstream from the mine for many years after the actual mining is finished, and natural habitat will not come back on the mine site for many decades. If approved, the modifications to the Touquoy Gold Project will enable more destruction of habitat and environmental contamination by facilitating more gold mines. In particular it will jeopardize projects undertaken in several watersheds on the Eastern Shore aimed at restoring Atlantic salmon habitat funded by the department of Fisheries and Oceans. Different levels of government should work together toward a common conservation goal rather than impede each other. Moreover, permitting the Touquoy mine modifications is contrary to the environmental goals of the Province, such as climate change reduction and conservation of biodiversity.

We do not support this expanded Touquoy Gold Project which has always had dubious benefits for Nova Scotia. As far as we know, AMNS has not yet paid corporate income tax to Nova Scotia, and royalties are infinitesimal. There will be jobs for a few years — which will be more than offset by a probable permanent loss of ecological services — in order to produce **gold**, a metal that is not even considered critical for Canada. The mine site will require monitoring and water treatment for two decades or more after closure, and in all likelihood the cost will end up being borne by the Nova Scotia tax payer. It will likely burden generations to come.

Today, April 22 is Earth Day, which should remind all of us that if dollars and cents could be assigned to Nova Scotia' natural assets, a project such as the Touquoy Gold mine would definitely not make any economic sense.

To: <u>Environment Assessment Web Account</u>
Subject: Touquoy Gold Project Site Modifications

Date: April 22, 2022 1:43:12 PM

Attachments: ASF Letter Touquoy Mine Expansion.pdf

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Hello,

Please find attached our comments for the current public comment period associated woth the provincial environmental assessment of Touquoy Gold Project Site Modifications. This submission is being made be me on behalf of the Atlantic Salmon Federation If you have any questions, comments, or concerns about our submission then please let me know.

Sincerely

Regional Director for Wild Salmon Watersheds Program Director for Nova Scotia and Prince Edward Island Atlantic Salmon Federation / Fédération du Saumon Atlantique

Atlantic Salmon Federation



Atlantic Salmon Federation



Fédération du Saumon Atlantique

April 22, 2022

Environmental Assessment Branch
Department of Environment and Climate Change
P.O. Box 442
Halifax, NS, B3J 2P8

Fax: (902) 424-6925

To Whom it May Concern:

On behalf of the Atlantic Salmon Federation (ASF) I am writing to outline our concerns with the Touquoy Gold Project Site Modifications project that is being proposed by Atlantic Mining NS Corp and that is currently undergoing a provincial environmental assessment. We have serious concerns about this project around its need and the project's associated risks. We are concerned that project will have ramifications beyond the immediate area in terms of its risks to groundwater, its connections with other proposed mines undergoing separate environmental assessments, and to the ecosystem downfield from the proposed project.

While it has been practiced in other jurisdictions, the utilization of in pit disposal of tailings as proposed by the proponent is a relatively new concept within Canada. As such our current regulatory and environmental framework has not fully explored the potential implications and impacts of this practice. This is also not a sufficient body of evidence to demonstrate under what conditions this practice would be safe and not pose a risk of groundwater contamination. In jurisdictions where in-pit disposal of tailings has been practiced the recommendations are that the practice should only be employed where groundwaters are contaminated and unpotable. This is not the case on the Eastern Shore, where groundwater quality and quantity are important for human use and aquatic life. The proponent in their documentation have not sufficiently demonstrated that the risk associated with the project is minimal, that their monitoring plan would be able to detect contamination, nor that they have proven remediation and mitigation practices and policies in place. Given the unknown nature of the practice and the importance of groundwater to sensitive species and for human use this practice should not be permitted until such time as the conditions for minimal risk and mitigative measures for contamination can be developed. As this practice is central to the current project, this environmental assessment should not be approved.

According to registration and addendum registration documents, the capacity of the Touquoy facility is currently ~6.8 Mm3. Given the stated total need of ~6Mm3 the current facility sufficient to meet the stated needs of the Touquoy mine with additional remaining capacity of ~0.7Mm3. The request for expanded capacity therefore must only be needed to meet the proponent's capacity for their proposed additional mines sites. These additional sites are not yet approved and are subject to their own environmental assessments. Habitat should not be destroyed or damaged in preparation for sites not yet approved, especially as those processes are separated from this assessment process. Given that this expanded capacity is needed for proposed additional mines sites then assessment of this need for expanded capacity should be incorporated into the ongoing environmental assessment process associated

Program Director for NS and PEI, Atlantic Salmon Federation

Nova Scotia Office 202 Cloverville Rd. Antigonish, NS, B2G 2M8 ASF Headquarters
PO Box 5200 S Andrews, NB, E5B 3S8
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www.asf.ca

Atlantic Salmon Federation



Fédération du Saumon Atlantique

with these other proposals and not conducted as separate process that operate under a different regulatory framework.

Even if the capacity of the Touquoy facility is expanded by the requested 2.5Mm3 it will still would not be large enough to manage the additional capacity required for the companies yet unapproved proposed expansions. Using the capacity requirements outlined in the amended registration documents, the Beaver Dam mine alone will require an additional ~5.4Mm3 of capacity. Considering the current stated capacity, the capacity needed to meet the needs of the Touquoy mine and the expansion plans, the proposed expansion would still be short in capacity by ~3Mm3. As this proposal is to meet the expansion it seems a significant oversight that no plan has been identified in these documents nor in any of the other mine proposals to account for this missing ~3Mm3 in capacity. This discrepancy needs to be addressed. As stated above the proper place to address this expansion is therefore under the current environmental impact assessments for the other proposed mine sites.

As the proponent indicated, the capacity of the current facility was reduced due to concerns around impacts to the environment. It is not clear how that initial proposal has changed with respect to the projected impacts that they were forced to avoid previously. If the current proposal is different and it was a viable option, then why was it not explored previously? In their documentation the proponent does not seem to make any new case for how potential impacts are different or why they these impacts are justified now when they were not previously.

The proponent indicates that they have a need for expanded capacity because of increased amount of processing. However, in comparing the originally intended capacity against the initially proposed capacity needs for Touquoy and the additional sites it is evident that the capacity at Touquoy was always sufficient to manage Touquoy's needs even with increased processing and was never going to be sufficient to manage all the proponent's expansion plans. This was not addressed during the initial assessment of Touquoy because at that time the capacity estimates of the proposed additional sites were not in the public record. It was identified during the initial environmental assessment process that the storage facilities were oversized for Touquoy and this additional capacity was clearly being developed for additional mine operations. This seems like dealing in bad faith as the rationale provided indicates a change in process as the need for the modifications when the data suggests that is really expansion plans driving this need and as this separates the storage requirements of additional mines from the federal environmental assessment processes of those additional mines. If the purpose for this expansion in capacity is to provide infrastructure for additional mine operations, as seems to be the case, then under this environmental assessment of the environmental impact of the additional capacity needs to be outlined and considered as part of the assessments of those additional mines. They storage facilities cannot be separated from the mine operations they support as they are connected and dependent on one another and so the assessment of their environmental impacts needs to be jointly evaluated.

Species at Risk, specifically American Eel, were identified within the project area as were other anadromous species. The documents provided by the proponent refer to seeking authorization from DFO, however no detail on mitigation or avoidance planning was provided in those documents. It is suggested that offsetting is likely to be required yet no offsetting plan or description of potential

Program Director for NS and PEI, Atlantic Salmon Federation

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Atlantic Salmon Federation



Fédération du Saumon Atlantique

offsetting was provided. Environmental impacts cannot be accurately assessed until details are provided on how the proponent plans to address the impact.

As identified by the proponent in both the registration and amended registration documents, the hydrological flow of Moose River will be impacted by proposed project. Moose River drains into known Atlantic Salmon habitat and other at-risk species habitat. Disruptions to key environmental parameters, such as groundwater quality and hydrological flow, are well documented to affect and alter downstream habitat. It is therefore reasonable to assume that the proposed project will have down field and far field effects. No information has been provided on the scope and scale for these potential impacts, nor on the mitigating factors of this changes on discharge locally or downstream, nor on how these impacts will be managed, mitigated, and/or offset. Until this information is provided the environmental impact of this project cannot be fully or accurately evaluated.

Given the unknowns and risks associated with this project and its clear connections with additional mine operations and their ongoing environmental assessments it is not appropriate for this this project to be approved at this time. The project approval should be delayed until such time as the missing information on risk to groundwater can be determined, the downfield effects and mitigation actions of the local and downfield effects on habitat are provided, and the impacts on the environment are fully evaluated in the context of the additional mines ongoing environmental assessments and their expanded regulatory authority. We thank you for considering our input and await your decision.

Regional Director of Wild Salmon Watersheds Program Director for Nova Scotia and Prince Edward Island Atlantic Salmon Federation

About ASF:

The Atlantic Salmon Federation (ASF) is an international conservation organization established in 1948. The Federation is dedicated to the conservation, protection and restoration of wild Atlantic salmon and the ecosystems on which their wellbeing and survival depend.

ASF's headquarters are in St. Andrews, New Brunswick, Canada, with regional offices in each of the Atlantic provinces, Quebec, and Maine. ASF maintains a network of six regional councils (New Brunswick, Nova Scotia, Newfoundland and Labrador, Prince Edward Island, Quebec, and Maine) and over one hundred affiliates that cover the freshwater range of wild Atlantic salmon in Canada and the United States. Through this network ASF represents more than 25,000 volunteers and members. The Nova Scotia Salmon Association (NSSA) is ASF's regional council in NS.

Program Director for NS and PEI, Atlantic Salmon Federation

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PO Box 5200 S Andrews, NB, E5B 3S8
800 565 5666; savesalmon@asf.ca

www.asf.ca

From: Environment Assessment Web Account
To: Environment Assessment Web Account
Subject: FW: Proposed Project Comments
Date: April 4, 2022 3:10:44 PM

----Original Message----

From:

Sent: April 4, 2022 11:53 AM

To: Environment Assessment Web Account <EA@novascotia.ca>

Subject: Proposed Project Comments

** EXTERNAL EMAIL / COURRIEL EXTERNE ** Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: My comments for this project are positive. I support the development and operations of the Touquoy Gold Mining project in Moose River. This is not a historical operation with utter disregard to the community and environment. The current operations in the area are industry leaders, especially within the province. I believe the project delivers on its role to be a leader in protecting the environment while operating sustainably. The science and technology invested in this project illustrate the commitment to the environment and local communities for current and future generations. When all is said and done, this area will be a positive example and reminder of how modern mining can be successfully achieved within this beautiful province. Name:

Email: taylor.

Municipality: Coldbrook email_message: Privacy-Statement: agree x: 64 y: 21

From: Environment Assessment Web Account
To: Environment Assessment Web Account
Subject: FW: Proposed Project Comments
Date: April 5, 2022 4:44:33 PM

----Original Message----

From: @gmail.com>

Sent: April 5, 2022 10:13 AM

To: Environment Assessment Web Account <EA@novascotia.ca> Subject: [PROBABLE-SPAM] Proposed Project Comments

** EXTERNAL EMAIL / COURRIEL EXTERNE ** Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: Stop mining the amount of Water used and abused by chemicals and pollution from mining is killing wildlife. WATER IS NOT REPLACABLE! all life depends on Water! Stop gouching and harming my Mother the Earth, signed Mikmaq Woman of this unceeded stolen land start consulting the inherent title holders of these lands that this mine is on! Signed Name:

Email: @gmail.com Address: Municipality: Indianbrook

reserve email_message: Privacy-Statement: agree x: 39 y: 28

From: Environment Assessment Web Account
To: Environment Assessment Web Account
Subject: FW: Proposed Project Comments
Date: March 25, 2022 1:28:05 PM

----Original Message-----

From:

Sent: March 24, 2022 6:56 PM

To: Environment Assessment Web Account <EA@novascotia.ca>

Subject: Proposed Project Comments

** EXTERNAL EMAIL / COURRIEL EXTERNE ** Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ?Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email:

Address:

Municipality: Belmont email_message: Privacy-Statement: agree x: 68 y: 19

From: Environment Assessment Web Account
To: Environment Assessment Web Account
Subject: FW: Proposed Project Comments
Date: March 29, 2022 9:57:43 AM

----Original Message----

From:

Sent: March 28, 2022 10:24 AM

To: Environment Assessment Web Account <EA@novascotia.ca>

Subject: Proposed Project Comments

** EXTERNAL EMAIL / COURRIEL EXTERNE ** Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ?Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email:

Address:

Municipality: Bedford email_message: Privacy-Statement: agree x: 54 y: 24

To: <u>Environment Assessment Web Account</u>

Subject:Proposed Project CommentsDate:March 29, 2022 2:13:07 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ?Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects Name:

Email: @stbarbara.ca Address: Municipality:

Mooseland email message: Privacy-Statement: agree x: 48 y: 24

To: <u>Environment Assessment Web Account</u>

Subject:Proposed Project CommentsDate:March 29, 2022 3:30:10 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: I am 100 in support of the Touquoy Project and any site modifications! I was born and bred in East Hants, Nova Scotia. I can say from experience that our labour market is severely lacking and options for employment with a decent wage and benefits is near non-existent. I am proud to fully support the Touquoy mine and its expansion and modification projects. Mining is not the same game it was, even 30 years ago. I pride myself on my open and keen mind and the fact that I am . When it came to mining, I was living in the past. I was shocked to realize how much has changed. I dont say this often, but everything I thought I knew about the big bad miners, was plain old wrong. When the opportunity arose in 2020 February, just before Covid shut the world down to work on a limited, contractual basis, I was incredibly reluctant to agree. Even with the great pay, being a product of the 80s and 90s, I am very concerned with the Environment and our lasting impact on the land that we are blessed to have support us. Work for a mine? No thanks! But I am glad I took the job as I was dumbfounded to realize how wrong I was and how my bias was based on old ideas and ignorant opinions. I put much credence in old practices and judgements of the past, which are just no longer true. Please consider doing your research before you jump on the band wagons of FOR or AGAINST... you may find yourself intrigued with the innovations that have come about in recent years. The Touquoy mine was reopened in 2017 and has been safely operating since. The proposed modifications will allow us to continue to operate in a safe, respectable and sustainable way, providing opport unities for many families and communities to grow and support their families and good works and allow them to continue to grow in the province we have pride in and love. There have been many studies completed, alongside with respectable environmental consultants, third party-technical specialists and university environmental professors, on board and providing their knowlege and expertise in the current operations and plans for the future operations and continuation of the mine. I am completely confident that the science used in the proposed modifications have been and will continue to be completed to a very high standard, based on thorough investigations, analysis and design. Further, I have much confidence in the conclusions presented and submitted and that with the planned assessment, mitigation, follow up monitoring, the proposed modifications are not likely to result in significant environmental effects. Please support our fellow Nova Scotians and the many local busine sses that rely on the Touquoy operation as a means to support their families and give us the ability to stay in Nova Scotia. Many jobs direct and indirect, rely on you and your support of us.. your neighbours, friends and families. Thank you! Name: Email:

Address: Municipality: Bedford

email message: Privacy-Statement: agree x: 81 y: 16

From:

@hotmail.com

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments

Date: March 29, 2022 7:22:07 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: Rural NS needs work and approval for all industrial projects like this one . Please approve the upgrades to keep families home and working . Name: Email: @hotmail.com Address:

Municipality: westville email_message: Privacy-Statement: agree x: 85 y: 13

To: Environment Assessment Web Account

Subject:Proposed Project CommentsDate:March 29, 2022 9:39:54 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ? Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email:

Address: . Municipality: Bedford

email_message: Privacy-Statement: agree x: 55 y: 16

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments

Date: March 30, 2022 11:58:49 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ? Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email: @stbarbara.ca Address: Municipality: Upper Musquodoboit

email_message: Privacy-Statement: agree x: 61 y: 23

From: @gmail.com

To: <u>Environment Assessment Web Account</u>

Subject:Proposed Project CommentsDate:March 30, 2022 8:09:32 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Project: touquoy-gold-project-site-modifications/ Comments: NO - no more destruction of the 3environment qnd no extreme heavy traffic on the road and no more noise Name:

Email: @gmail.com Address: Municipality: Port

Dufferin email_message: Privacy-Statement: agree x: 49 y: 23

Subject: Proposed Project Comments

Date: April 4, 2022 11:16:14 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: I am writing to express my support for the Touquoy Gold Mine project and join 76 of Nova Scotians that support environmentally responsible gold mining in the province. I am asking that you and your government allow the project modifications at the Touquoy mine to proceed in an environmentally responsible way. Atlantic Operations has embraced participating in a stringent Environmental Assessment process for the Touquoy mine modifications in good faith and has developed a plan to assess and mitigate any environmental impacts that may result. To not allow these modifications to proceed would not be in keeping with the sciencebased assessment process and could put hundreds of Nova Scotiansâ?T jobs at risk. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and design to provide fulsome responses to the information requests, and I am confident in the conclusions presented. The work carried out and presented in St Barbaraâ? Ts most recent submission confirms the earlier conclusions: in consideration of the assessment, mitigation, and planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. Thank you for your attention to this very important matter. I look forward to hearing more about how this government is supporting much needed rural economic development in Nova Scotia. Name: Email: @hotmail.com Address:

Municipality: Mooseland email message: Privacy-Statement: agree x: 99 y:

From: @yahoo.ca

To: Environment Assessment Web Account

Subject: Proposed Project Comments

Date: April 4, 2022 11:36:15 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: I believe the Touquoy Gold Project is a prosperous venture for the province of Nova Scotia. This project will supply many jobs for the people of NS and will boost our economy immensely. Thank you. Name:

Email: @yahoo.ca Address:

Municipality: Middle Musquodoboit email_message: Privacy-

Statement: agree x: 59 y: 28

From: <u>@msn.com</u>

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments

Date: April 8, 2022 1:32:10 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: I have worked at the mine for 5 years and believe the company is doing an excellent job with all environmental aspects. Name:

Email: @msn.com Address:

Municipality: brookside email_message: Privacy-Statement: agree x: 76 y: 26

From: <u>@hotmail.com</u>

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments

Date: April 8, 2022 6:41:29 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: The damage to the environment is not worth the profit or jobs, Iâ?Tm fighting against an open pit coal mine here in Alberta Name: Email: @hotmail.com Address: Municipality:

Hillcrest email_message: Privacy-Statement: agree x: 90 y: 34

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments

Date: April 8, 2022 6:43:29 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: This project raises serious environmental concerns. Gold mining, especially open pit mining, is one of the most adversely impactful forms of resource extraction. Moreover, much of the gold used world-wide is for non-essential reasons such as jewelry. The cost to the local communities, wildlife, water systems and land in the long run cannot be justified by the benefits of the mine which will mainly benefit a company. As our elected government, your role is to protect our collective public interests over the profits of a corporation and I urge and trust you to make the decision that is in the public good. Name:

Email:

Address:

Municipality: Wolfville email message: Privacy-Statement: agree x: 45 y: 27

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments **Date:** March 25, 2022 7:21:35 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ? Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email:

Municipality: Mooseland, Middle Musquodoboit email message:

Privacy-Statement: agree x: 93 y: 17

To: Environment Assessment Web Account

Subject: Proposed Project Comments

Date: March 25, 2022 7:56:07 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: The continued operation of this project means the lively hood of me and my family. Without the approval of these permits, my family will no longer be able to be live in this province. Having a career of over 10 years in the mining industry, I truly find this company to have safety, environment, and community in the forefront of everything they do and hope the government holds true to their promise to be open for business and development. I will find it hard to imagine any other mining company willing to continue to invest in exploration if a current operating mine does not receive the required permits to continue to operate and it will be a huge missed opportunity for Nova Scotia. This province desperately needs more higher paying jobs such as the jobs that all mining companies offer. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Address: Municipality: Elmsdale email message:

Privacy-Statement: agree x: 79 y: 18

To: <u>Environment Assessment Web Account</u>

Subject: Proposed Project Comments **Date:** March 27, 2022 3:40:30 PM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ? Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications can be completed to a very high standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. I thank you for your time and fully support these modifications being approved. Name:

Email: Address: Municipality: Sheet Harbour

email_message: Privacy-Statement: agree x: 66 y: 29

From: <u>@gmail.com</u>

To: <u>Environment Assessment Web Account</u>

Subject:Proposed Project CommentsDate:March 28, 2022 9:32:19 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: Working directly with Touquoy stakeholders and contractors, I have seen first hand the care, time and effort Atlantic Golds management team, environmental team, and site personnel take on a daily basis to mitigate all environmental impact potential. The care for environmental sustainability and wildlife is second to none. Name:

Email: @gmail.com Address:

Municipality: Onslow Mountain email message: Privacy-

Statement: agree x: 69 y: 25

To: <u>Environment Assessment Web Account</u>

Subject:Proposed Project CommentsDate:March 29, 2022 9:30:31 AM

** EXTERNAL EMAIL / COURRIEL EXTERNE **

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Project: touquoy-gold-project-site-modifications/ Comments: As a team member at St Barbaraâ?Ts Atlantic Operations, I know how important these proposed project modifications are to the region where we work. We have operated safely since 2017 and these proposed modifications will aid us in continuing to operate in the same safe, sustainable and respectable way to the environment. Many of my colleagues worked hard on the numerous documents and studies that were completed and submitted to the government, I have confidence in the science that was used and that these modifications will be completed to a very high, exceptional standard. I am confident that the team responsible for this project, including third-party technical specialists, have completed thorough investigations, analysis, and designs to provide fulsome responses to the information requests, and am confident in the conclusions presented. The work carried out and presented in the submission confirms the conclusions presented earlier: in consideration of the assessment, mitigation, planned follow up and monitoring, the planned modifications to the Touquoy site are not likely to result in significant environmental effects. We are looking to have a great economy in Nova Scotia while protecting the environment. Name: Email: Address:

Municipality: Middle Sackville email_message:

Privacy-Statement: agree x: 61 y: 29

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

Dear Minister Halman,

Support for the Touquoy Gold Mine project Modification,

I am writing to express my support for the Touquoy Gold Mine project and join 76% of Nova Scotians that support environmentally responsible gold mining in the province. I am asking that you and your government allow the project modifications at the Touquoy mine to proceed in an environmentally responsible way.

Atlantic Operations has embraced participating in a stringent Environmental Assessment process for the Touquoy mine modifications in good faith and has developed a plan to assess and mitigate any environmental impacts that may result. To not allow these modifications to proceed would not be in keeping with the science-based assessment process and could put hundreds of **Nova Scotians' jobs at risk**.

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Thank you for your attention to this very important matter. I look forward to hearing more about how this government is supporting much needed rural economic development in Nova Scotia.

01

Sincerely.

Name Printed

Name Signed

Date

April 6 Jean

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca

premier@novascotia.ca

Dear Minister Halman,

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Sincaraly

Name Printed

Name Signed

Date

Maran 25, 2022

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

Dear Minister Halman.

Support for the Touquoy Gold Mine project Modification,

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Sincerely,

Name Printed

Name Signed

Date

30/03/2022

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca

premier@novascotia.ca

Dear Minister Halman,

Support for the Touquoy Gold Mine project Modification,

I am writing to express my support for the Touquoy Gold Mine project and join 76% of Nova Scotians that support environmentally responsible gold mining in the province. I am asking that you and your government allow the project modifications at the Touquoy mine to proceed in an environmentally responsible way.

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Thank you for your attention to this very important matter. I look forward to hearing more about how this government is supporting much needed rural economic development in Nova Scotia.

Sincerely,

Name Signed

March. 30, 2022

Name Printed

Date

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

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premier@novascotia.ca

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Sincerely,

Date

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Name Printed

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Sincerely, A ALL

Name Printed Name Signed

Date

March 30/22

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

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Support for the Touquoy Gold Mine project Modification,

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Sincerely. __

U. O

Name Printed

Name Signed

Date

un work 30 00

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Cincerolu A	1. 1. 1	Spil 6/22
Name Printed	Name Signed	Date

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

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Sincerely,		
- N		04/05/22
Name Printed	Name Signed	Date

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

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Sincerely, C

Name Printed

Name Signed

Date

Mr 30 200

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

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Sincerely,

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Date

Mar 30/2022

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Name Printed

Name Signed

Date

03/30/20

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca

premier@novascotia.ca

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Sincerely.,

Name Printed

Name Signed

Date

APr.1/6/2C

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

Dear Minister Halman,

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Sincerely.			March 28,2022
Name Printed	Name Signed	Date	

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca premier@novascotia.ca

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Name Signed

30/03/2012

Date

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energyminister@novascotia.ca premier@novascotia.ca

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Name Printed

Name Signed

Date

April 3rd 2027

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energyminister@novascotia.ca

premier@novascotia.ca

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premier@novascotia.ca

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Name Printed

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Date

May 31/22

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MARCH 31/22

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			April 1/22
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Sincerely,			11	212 00
			March	30,2022
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Sincaraly

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Name Signed

Date

March 3/22

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Sincerely.		121	
		April	
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4-4 0222

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Thank you for your attention to this very important matter. I look forward to hearing more about how this government is supporting much needed rural economic development in Nova Scotia.

Cincoroly

2022-03-30

Name Printed

Name Signed

Date

Minister Timothy Halman Nova Scotia Environment PO Box 442 Halifax, NS B3J 2P8

CC:

energyminister@novascotia.ca

premier@novascotia.ca

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March 3010 2027

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Spr. 1. 3, 2022

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