



September 6, 2013

Hon. Charlie Parker
Minister of Natural Resources
3rd Floor, Founders Square
1701 Hollis Street
Halifax, Nova Scotia
B3J 2T9
Sent via email: min_dnr@gov.ns.ca

Re: Crown Land Management: a conceptual plan for Western Nova Scotia

Dear Minister:

I am writing on behalf of the Mining Association of Nova Scotia (MANS) to comment on the proposed plan for the western Crown lands, "Crown Land Management: a conceptual plan for Western Nova Scotia."

We are extremely disappointed that the proposed plan places so little importance on mining and quarrying, and does not in any way reflect the input we provided in our April 25, 2013 letter to you, in which we argued that the western Crown lands "must remain open to mineral exploration and development for the good of the province's economy."

Our position, which we hope to see reflected in the revised version of the plan, is that the western Crown lands should essentially be treated now as they were prior to them being purchased by the government, and as any other crown land is treated in terms of mineral exploration and development: the Crown owns the mineral rights and exploration should be allowed to take place throughout the western Crown lands for the good of the province's economy and all Nova Scotians. The only exception is that exploration on protected lands should be subject to our proposed "land swap" mechanism in order to ensure an appropriate balance between protecting natural lands and protecting jobs and economic opportunity.

As you know, Department of Natural Resources mapping shows that much of the western Crown lands have high mineral potential and could be key to the future success of the industry and its ability to create jobs for Nova Scotians. Despite this, the plan suggests that mining and quarrying should only be a priority in one of nineteen geographic areas within the western Crown lands. By comparison, the plan lists forestry as a priority in eleven of the nineteen areas. This is not acceptable.

We understand that not being listed as a “planning value” in an area would not, in theory, prevent mining/quarrying from taking place. However, it clearly would not make it any easier for a company to get approvals and community support. By not listing mining/quarrying as a high priority in eighteen of nineteen areas, the plan is effectively saying that mining/quarrying is a low priority in these areas. This is harmful to the industry and the province’s economy.

We are concerned that the proposed plan, combined with the government’s inflexible protected lands policy, will leave Nova Scotians without access to the minerals we need to support our way of life and economic prosperity in the future. For example, aggregate for roads, highways and other construction represents approximately three-quarters of the province’s mining and quarrying industry. As the government continues to reduce the amount of land available for exploration and production, it will become increasingly difficult and expensive to access the aggregate we need to build and maintain our infrastructure. The same is true of other minerals which are also vital to our modern society, such as base metals, gypsum, limestone, gold and salt. Protecting natural lands for future generations is important, but so is ensuring that future generations have affordable access to the materials they will need to build homes, roads, hospitals and schools. So is ensuring that future generations have jobs.

Solutions

As previously discussed, we believe there are simple solutions to this problem:

First, a “land swap” mechanism should be added to the protected lands regulatory regime which would allow mining and quarrying companies to access protected land by purchasing land of equal size and ecological value outside of the protected areas and arranging for it to be protected instead. This would ensure that:

- The total amount of protected land remains the same or grows;
- The ecological value of protected lands remains the same or grows; and
- Nova Scotians will continue to be able to access the minerals they need to create jobs and grow the economy.

Second, MANS would like to see a cap on the amount of land that the government can protect. This would put a reasonable limit on the amount of land that is removed from economic use.

Third, and with specific reference to the western Crown lands, MANS believes that mining and quarrying should be a priority throughout the former Bowater lands – that it is in the best interest of



all Nova Scotians to find and develop mineral deposits in the area to ensure future job creation and economic growth.

Currently, the Government of Nova Scotia plans to protect over 13% of the province's land mass. By comparison, the other Atlantic provinces have only protected 3.1% (New Brunswick), 2.8% (PEI) and 4.6% (Newfoundland and Labrador) of their land masses. We are clearly out of step with our neighbouring provinces and putting ourselves at a disadvantage economically. The simple, pragmatic proposals discussed above would help correct this situation by striking an appropriate balance that protects both natural lands and future economic opportunity for Nova Scotians.

Final Plan Review

Given the importance of the western Crown lands to the mining and quarrying industry, and how harmful to the industry the draft plan is, we respectfully request that we be given an opportunity to review the final plan before it is finalized. We believe this would be in the best interest of both the government and the industry since it would prevent additional mistakes – which is what we hope the draft plan was, not a deliberate slight to the industry - from being made on this file.

Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "SKirby", is written over a light grey circular stamp.

Sean Kirby, Executive Director
Mining Association of Nova Scotia