

Final submission

Thank you for giving us the opportunity to give a closing statement regarding the New Prosperity Mine proposal.

As we explained in our previous submission, the Council of Canadians is a national organization working for environmental protection and social justice. The local chapter of the Council opposed the original Prosperity Mine proposal because of its significant environmental impacts as well as high social costs. Members of our local chapter participated in the 2010 hearings attending the general sessions in Williams Lake, First Nations communities, and the topic-specific sessions. We have done the same this time around and we have heard nothing to change our minds. We believe the cost is too high to justify any hoped-for economic benefits. A possible short-term boost would come with guaranteed long-term losses: the permanent damage of a significant watershed, and the lifestyle of the people who live there. Along with being the habitat for many species of wildlife, the watershed is part of an aquatic network that is vital to the survival of Pacific salmon.

We wonder how many of the interested parties who are for the mine, have actually attended the topic-specific hearings. This would have given them a much better understanding of the proposal and its potential impacts, and they would be in a better position to make an informed opinion. Our chapter tried twice to set up a community panel discussion with Taseko, the City, the Chamber of Commerce, the TNG, a representative from an environmental group and a social planner, to discuss the issue but the mine proponents showed no interest this time, nor during the first hearings. We feel this lack of understanding has contributed to divisions in our community.

The mainstream media has portrayed the discussions as a First Nations vs. Prosperity dispute. This manufactured division has been one of the more unfortunate outcomes of the debate over both mine proposals. As you will have heard in these sessions, this particular division is far from the truth. There is considerable opposition to the mine from local individuals and families, from existing groups like ours, and from provincial and national organizations. Two local grassroots groups, the Fish Lake Alliance and Friends of Fish Lake were formed specifically to intervene in this new proposal. The Friends of Nemiah, formed in 1989, is a unique provincial research-oriented association supporting the Xeni Gwet'in nation. We hope the panel will let the decision makers in Ottawa know about this widespread opposition to New Prosperity.

To return to the question of the mine itself, the uncertainty of so many aspects of the project is unsettling. It is disturbing to hear words like "experimental nature" referring to lake circulation, or "unproven" referring to the proposed nano-filtration scale, and "details required" on the Fish Creek watershed, and the suggestion in the presentations that "pertinent information was lacking". Health Canada wanted

local information on food. Environment Canada wanted *local* climate and hydrological trend analyses.

In July 2011, the BC Auditor General made a scathing report that “the Environmental Assessment Office cannot assure British Columbians that mitigation efforts are having the intended effects because adequate monitoring is not occurring and follow-up evaluations are not being conducted.” In a February 2013 report the Auditor General noted serious shortcomings in the province's capacity to monitor mining practices and threats to the biosphere. This makes it extremely important that the CEEA review these issues.

The technical presentations gave us what we think is a relatively accurate picture of the main components of the proposed mine. Taseko claims that with this proposal, Fish Lake would be saved. And, while it is true that it would no longer be drained as was planned in the first proposal, the lake would be put on life-support – forever. It would become part of a large-scale experiment. The outflow from the lake would be completely blocked off during the life of the mine and the water flowing into Fish Lake would be reduced by 60%. In order to maintain circulation in the lake and have enough water in the spawning channels, water would have to be pumped from the lake back up into the creeks – forever. There would probably also be the necessity of providing aeration and water treatment for the lake – forever. A huge open pit would be excavated within 300 meters or less of Fish Lake. A Tailings Storage Facility would be constructed at a higher elevation approximately 2 km to the south, which would destroy Little Fish Lake and its surrounding wetlands. The Tailings Storage Facility has been described as five times the size of Williams Lake with a 4 km long, 34 story high wall facing Fish Lake. It would be necessary to pump contaminated seepage back into the Tailing Storage Facility – forever.

We wonder what the life span of these earth fill embankments is, but we expect that they won't last forever. Contaminated seepage that is not contained would make its way to Fish Lake affecting water quality. After closure of the mine the mine pit would be filled with water that would have to be treated before being released into Lower Fish Lake. It is possible that a water treatment plant would have to run forever.

Taseko has stated that the 125 km long hydro line into the mine would be decommissioned after closure. So, where will the power come from to run all these pumps, treatment plants, etc.? Taseko's answer to this question was 'we have to wait and see,' 'perhaps diesel generators'. In reality even if the pumping, aeration and filtration worked, or even if the embankments held, the bottom line is that this piece of pristine wilderness would be gone, again, forever.

It is questionable whether or not a realistic cost-estimate has been developed that will cover perpetual water recirculation, water treatment and the disposal of waste products. Logic tells us that even in the absence of a major malfunction or

accident, the perpetual annual cost of attempting to contain toxic mine waste and maintain water quality will impact the profitability of the project.

Equipment failure, human error and acts of nature cannot be avoided. The earthquake/tsunami that crippled the Fukushima nuclear plant in 2011 is leaking toxins into the ocean at an alarming rate and as yet neither the company that owns the plant nor the government know what to do about it. Events such as these linger in the mind as the concerns over New Prosperity add up. These are not the legacies we wish to leave to future generations.

We also wish to draw the panel's attention to the relevance of the cumulative effects this major industrial development proposal will have on such a sensitive region of the province. These effects must be considered along with future resource activities and other values, traditional uses of the watershed, and the downstream user, and the unique nature of the Chilcotin.

Given the fluctuations of the gold and copper markets, there is a reasonable concern that Taseko may not have the financial resources to deal with long-term liability. It isn't unusual for mines to close when ore values drop. The wellbeing of Prosperity mine ^{would} depends on the stability of gold and copper prices which could fall below a sustainable figure at any time. And Taseko could sell the company at some future point to outside interests that might be even more difficult to hold to account.

In conclusion, like many others, we believe the balance sheet is heavily weighted against the development of the mine. Taseko might be able to provide some wealth to a few people in the Chilcotin, the Williams Lake, and the 100 Mile House communities, but not without causing long-term grief and destruction to many others. And there will be a significant impact to the environment.

Environmental issues cannot be separated from First Nations issues. We should remember that the Tsilhqot'in have proven rights and are asserting legal title to the land in question as are the Secwepemc who face a proposed power line through their territory. We feel that Canada has an obligation to prevent *all* applications of extraction on aboriginal ancestral land, that ~~does~~ not involve the First Nations people concerned, at every level.