

Canadian Société Parks and pour la nature Wilderness et les parcs Society du Canada

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Mackenzie Valley Land and Water Board

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May 10, 2002

Our Chapters:

CPAWS Nova Scotia

RE: North American Tungsten Corporation Ltd. Water License N3L2-0004

CPAWS Montreal

Dear Ms Cordell:

CPAWS Ottawa Valley/ Vallée de l'Outaouais

I am writing on behalf of the Canadian Parks and Wilderness Society (CPAWS)
National Office. CPAWS is a national conservation organization with close to 30,000 members and eleven chapters across the country, including the NWT and Yukon.
Protecting the Greater Nahanni Ecosystem is a top priority of our NWT Chapter and is also a national conservation priority as well.

CPAWS Wildlands Leagu

...WS Manitoba

CPAWS Saskatchewan

CPAWS Calgary/Banff

CPAWS requests that the application for renewal of the water license for the CanTung mine be referred to an environmental assessment because of the mine's potentially significant environmental impacts on the South Nahanni River and Nahanni National Park Reserve, a World Heritage Site, located downstream.

CPAWS Edmonton

Any industrial development in the South Nahanni Watershed poses a risk of contamination to the waters of Nahanni National Park Reserve, and should therefore be subject to a full environmental assessment. We are concerned about the cumulative effects of mining and oil and gas development in the South Nahanni Watershed. An environmental assessment provides the opportunity to assess cumulative effects.

CPAWSYukon

CPAWS NWT

We also have specific concerns relating to the environmental risks posed by the Can Tung mine operations. The mine was inactive for 15 years, and shortly after reopening incurred a 23,000 litre fuel spill. Spills of fuel pose an obvious risk of contaminating the waters of the Flat River and the National Park Reserve waters downstream. An assessment is required to ensure that all possible preventative measures are in place to prevent future spills. There have also been reports that the tailings pond has been seeping. This also poses a potential threat to water quality and needs a full assessment. Finally, the mine re-opened without being subjected to an environmental assessment, and since the mine does not require a new land use permit,

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this water license renewal represents the only opportunity to assess the environmental impacts of the mine after 15 years of inactivity.

Nahanni National Park Reserve is a world-renowned wilderness area, and the South Nahanni River is a premier international wilderness canoeing destination. Mining and its inherent risk of contaminating pristine park waters poses a threat to the wilderness values that Canadians and international visitors value highly. The mine poses significant adverse socio-cultural impacts as well that should also be assessed through an environmental assessment.

In conclusion, Canada has an international responsibility to protect the ecological integrity of Nahami National Park Reserve. To ensure that this protection is achieved, we ask that the Mackenzie Valley Land and Water Board order an environmental assessment of the CanTung mine in response to the water license renewal application.

Sincerely,

Stephen Hazell

Executive Director

Canadian Parks and Wilderness Society

Cc: Vern Christensen, Executive Director, Mackenzie Valley Environmental Impact Review Board The Hon. Robert Nault, P.C., M.P., Minister of Indian Affairs and Northern Development The Hon. Sheila Copps, P.C., M.P., Minister of Canadian Heritage