

<contact information removed>



**FRIENDS** of the  
NEMIAH VALLEY

August 20, 2013

Dr. Bill Ross, Dr. George Kupfer, Dr. Ron Smyth  
New Prosperity Review Panel  
Canadian Environment Assessment Agency  
160 Elgin Street, 22nd. Floor  
Ottawa, ON K1A 0H3

Dear Panel Chair and Panel Members;

Please accept the following Closing Remarks to the Panel from Friends of the Nemaiah Valley (FONV).

On behalf of FONV you have heard and received comment on the New Prosperity Mine project from anthropologist Dr. Marc Pinkoski, economist John Lerner, wildlife biologist Wayne McCrory, civil engineer Don MacKinnon, environmental scientist Dr. Karen Hurley, landscape planner Dr. Jonaki Bhattacharyya, and introductory remarks by myself as president of FONV.

These remarks are informed by the above presentations, our understanding of the EIS in its final form, the many technical presentations from both the proponent and others, and the hours of community testimony in the towns and communities of Cariboo/Chilcotin. Where we could not attend personally, we followed all hearings on line.

First, allow us to congratulate the Panel and CEAA staff for your endurance, patience, and apparently unflagging attention. The task you are engaged in is enormous and of great significance. Your report will affect the lives of many, many people.

Nothing we have heard since we prepared our introductory remarks causes us to revise our then conclusions as to the inappropriateness of this project. Quite the reverse. It appears to be an impossibly complex experiment with the environment that requires management in perpetuity with enormous impact on fish, wildlife, and the people of the Nemaiah Valley and beyond. It has the potential, particularly with the present proponent, of setting back Settler/Aboriginal relations a century and more. It appears to be of questionable economic benefit to society at large.

As we did for the Review Panel assessing Prosperity Mine in 2010, we draw your attention to the Sustainability Assessment Framework utilized by the Joint Review Panel considering the Kemess North Copper-Gold Mine Project. We think it provides a sound basis for an assessment of most projects, and particularly this one.

The Framework consists of five parts, to which we would add a somewhat unique legal situation; environmental stewardship, social and cultural benefits and costs, economic benefits and costs, fairness and distribution of the benefits and costs, present versus future generations.

- In terms of **environmental stewardship**, the negative impacts are clear and the mitigation efforts proposed of doubtful utility, especially with regard to grizzly bears. Both Wayne McCrory and Dr. Sue Senger presented authoritative and compelling evidence in this regard. Provincial, federal, and independent experts appear to all agree that Taseko's ability to preserve acceptable water quality in Teztan Biny and adjacent lakes is doubtful at best. Compensation strategies proposed appear to require the re-engineering of much of the territory and the opening up of areas better left alone.

- The **social and cultural benefits** are extremely one-sided where they exist at all. There may be some local economic benefit in a town like Williams Lake that will result in some social and economic improvements for a small business elite. The intrusion of a large number of miners, however, has not been demonstrated elsewhere to result in lowered crime rates, for example. The social costs to the people of the Nemiah Valley and other First Nations communities, on the other hand, will be enormous. They have spoken eloquently and at length about how they feel this will impact them. We should heed what they say. The same goes for the loss of culture that would attend this development. Both Dr. Bhattacharyya and Dr. Hurley have provided support for what Tsilhqot'in people themselves are saying, this mine will end a way of life that is struggling to move into a post-colonial era with resilience and fortitude. I believe it is not too much to say that this would be a crime against humanity.

- **Economic benefits and costs** would likewise be very unevenly distributed. There might be some economic benefit to local businesses. Some First Nations workers might be hired, though wage labour in a mine is a poor fit to the Tsilhqot'in way of life to which seasonal food gathering activities are central. Economist John Lerner has pointed out the negative economic consequences for the Xeni Gwet'in who have charted an independent economic course that requires a pristine environment and abundant fish and animals. Dr Shaffer's analysis is compelling that the larger economic benefits to society of this project are not only non-existent, but are actually net costs. We accept his analysis as the correct one. Don MacKinnon has outlined additional road costs that Taseko does not deny. The public purse would be required to subsidize a project with doubtful economic justification, though it might enrich TML shareholders and a few business people in Williams Lake, and, even less likely, in 100 Mile House.

- **Fairness and distribution of the benefits and costs.** As stated, the benefits would be few and, to the extent there are any, would accrue very unevenly. The costs would - overwhelmingly - be borne by local First Nations communities, especially Xeni Gwet'in and Yunesit'in. The cost to society at large in unrest and damage to Settler/First Nations relations would be incalculable and ongoing.

- **Present versus future generations.** Again, First Nations have spoken. They dread the loss of a spiritual place and a place of refuge and sustenance, a place where they transmit their way of life and values to the younger generations. This cannot be replaced or reclaimed once destroyed. A culture cannot be reclaimed once lost. But not only will First Nations lose. We have found through study and long experience that those who are latecomers to this land have important things to learn from those who have been here ten thousand years and more. We believe you will have been exposed to some of those lessons in life-ways, spiritual and otherwise, in your involvement in the Tsilhqot'in and other First Nations community hearings.

- We need not elaborate on the **legal situation** as it has been more than adequately addressed by Jay Nelson and Dr. Marc Pinkoski. Suffice it to say, the rights of the Tsilhqot'in people are firmly entrenched in Canadian law. We believe they are sufficiently strong to protect Nabas from the intentions of Taseko Mines Ltd. and New Prosperity Mine. However, it would be most regrettable should it come down to this.

A word on cumulative effects: this subject, while it may have the potential to take you beyond your immediate mandate, is of extreme importance in our view. An analysis means working from a baseline. TNG has provided this to some extent with its maps showing the extent of industrial development that has taken place or is planned. Logging and further mine development, which would be enabled by New Prosperity road and power line infrastructure, would compromise forever the protection of lands waters and wildlife between several already existing protected areas, making them useless for their intended purposes of preserving wildlife habitat. Such

enabling of future developments would project the impact of the mine beyond its immediate geographic area and even an extended mine life. This is a world class area of international significance and the potential for protection for it would be lost forever.

Finally, in closing, we wish to say that we greatly regret that this project, and the manner in which it has been promoted, has again brought division to the communities of Cariboo/Chilcotin. We think it was a mistake to allow it to be brought forward again. This has brought great distress to many, many people. We would like to be able to accept that the proponents believe they are doing something worthwhile for society and are acting in good faith. But they are very wrong when they say that we who oppose the mine are simply doing so because we “don't fully understand”. We understand all too well, and are prepared to say that it is their understanding that is deficient. Perhaps their experiences in Tsilhqot'in communities has brought them some understanding of just how harmful what they are proposing would be.

You are engaged in a huge task. You have the opportunity to do great harm or great good with your report. You are dealing with matters of national and global significance. We have great respect for the process as we have observed it, however, and feel confident that you will prepare an independent and honourable report that reflects the best of what this great country can be.

Respectfully submitted,

David Williams  
President  
Friends of the Nemaiah Valley