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Environmental Assessment Office
David Grace, David.Grace@gov.bc.ca
Jessica Warner, Jessica.Warner@gov.bc.ca

Subject: Public Comment on Red Chris Mine Block Cave Expansion

Dear Environmental Assessment Office (EAO),

I am writing to express my perspective regarding the proposed block cave expansion of the Red Chris Mine. I understand the economic importance of mining and that a shift to underground mining presents an opportunity to reduce environmental impacts compared to open pit mining; however, environmental risks and uncertainties remain with the Red Chris proposal that must be more thoroughly evaluated. Specifically, I have concerns regarding the following issues:

1. Block cave mining may increase terrain instability, and the risks and impacts of this are not adequately understood. In particular, the potential for landslides and/or debris slides to affect nearby fish habitat must be assessed.
2. The prediction that selenium, copper, and sulphate concentrations will peak earlier in downstream watersheds is concerning, especially since selenium accumulation in resident fish is already documented. More detailed studies are needed to understand how accelerated water contamination could affect aquatic life, particularly selenium bioaccumulation in fish.
3. Significant pre-existing issues have been documented at the mine, including i) tailings and waste rock seepage, ii) physical and chemical effects on fish, fish habitat, and other aquatic resources, and iii) issues threatening the stability of the tailings dams and increasing risks to people and the environment in the event of a dam failure. These issues must be addressed before approving any mine expansion.
4. Underground mining at Red Chris will shift the mine’s focus toward gold over copper production. This detail has been omitted from the mine’s expansion application. Gold is a luxury commodity, not a critical mineral, providing far less public benefit than copper, which makes it even more essential that risks and uncertainties associated with the project are thoroughly evaluated and addressed. The EAO must consider the reduced public benefit of gold mining when evaluating the risks of this project.
5. The public engagement process for this expansion is insufficient, given the project's complexity, scale, and potential impacts. The current opportunity to comment on the mine’s expansion application is vital; however, public opportunities must also be provided to i) comment on the EAO’s Assessment Report and ii) form a Community Advisory Committee.
6. Approval of this expansion will pave the way for future mine expansions that will compound existing risks and create new risks, particularly by expanding the mine’s tailings facility. The EAO must carefully consider the long-term environmental consequences of a phased expansion approach.

The Province has stated it is fast-tracking approvals of the Red Chris Mine expansion. This is concerning because provincial regulatory shortcomings have already exacerbated risks at this mine due to inadequate monitoring and mitigation requirements, lack of accountability to independent expert advice, and delays in assessing and managing environmental effects. It is vital that the Environmental Assessment process ensures that risks to water, fish, and communities are not traded for short-term economic gain. The Red Chris Mine expansion must not proceed without rigorous scrutiny, public transparency, and adherence to precautionary principles.

Thank you for considering my submission. I trust that the EAO will take these concerns into account and ensure any decisions made are in the best interest of the environment, local communities, and future generations.

Sincerely,
[Your Name]