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December 7th, 2012

Tim Ruthenberg
Ministry of Northern Development and Mines
Mineral Development Office (Sudbury)
933 Ramsay Lake Road
Sudbury, Ontario P3E 6B5

**RE: Comments on Environmental Registry posting 011-7539 – Northern Graphite Corporation –
Bissett Creek Mine**

Mr. Ruthenberg,

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) was founded some 43 years ago with a view to protect the ecological integrity of our parks and protected areas. Since then, we have become the lead wilderness conservation organization in eastern Ontario and western Quebec working to establish new parks and protected areas, ensuring that existing parks are managed to protect their ecological integrity and that linkages are maintained between protected areas and across the landscape to allow for the movement of species as a response to a changing climate.

We welcome the opportunity to provide some comments on the proposed Bissett Creek Graphite Mine (EBR posting 011-7539) and the mine's closure plan.

CPAWS-OV pioneered the concept of linking Ontario's Algonquin Provincial Park to Adirondack State Park in New York by way of the Algonquin to Adirondacks initiative or A2A. More recently, it has become evident that a connection to the Boreal forest was essential for the long term viability of the A2A concept, therefore we successfully obtained legal protection for part of the Dumoine River Watershed in western Quebec, which now connects Algonquin Park to the Boreal forests of Quebec. This is the only remaining connection of this type in eastern North America. The A2A – Dumoine River connection is a continentally significant connection that will allow species to migrate northward as they adapt to changing conditions brought about by climate change.

The proposed Bissett Creek Graphite Mine would be located in the heart of the Algonquin-Dumoine connection and could cause serious fragmentation of an otherwise intact link. Moreover, we are concerned that the proposal calls for the destruction of sizeable wetlands in the Grants Creek Watershed. We feel that insufficient work has been done to evaluate the significance of these wetlands and the potential downstream impacts of the mine on Grants Creek and the Ottawa River.

While the posting on the Environmental Registry indicates that the proposed mine would be in proximity to Algonquin Provincial Park, it fails to mention the fact that four other protected areas are

located within a few kilometres of the proposed mine site, namely Grants Creek Waterway Provincial Park, Bissett Creek Waterway Provincial Park, Driftwood Provincial Park and the Dumoine River Aquatic Reserve in Quebec. The documentation fails to address the way in which mine operators would reconcile the aspirations of recreationalists using the waterway parks and adjoining campsites with industrial activities taking place nearby. We are particularly concerned with acoustic impacts, air pollution and vehicle traffic impacting not only recreational users of the area, but also wildlife, including a number of species at risk. The documentation does not identify any mitigation measures to be instituted during both the construction and operation phases of the mine, including the dewatering process and the impacts on provincially significant wetlands.

We were not able to consult the full closure plan due to the fact that it was not made available in an electronic format on the EBR website. Our understanding is that a hard copy of the plan was available for review in a few localities, including Sudbury. We feel that this is completely inadequate. The public and organizations like CPAWS-OV have essentially been shut-out of the decision-making process as a result of the lack of information being provided by the Ministry of Mines and Northern Development and by the project proponent. This is a significant project that will affect a large area of undeveloped land – local communities, concerned citizens, First Nations and other stakeholders must be consulted in a meaningful fashion. Residents need to know the costs and benefits associated with such a project in order to formulate an informed opinion on the project. The information currently available is insufficient to properly assess a project of this magnitude.

Therefore, CPAWS Ottawa Valley is recommending that the Ministry of Mines and Northern Development not approve the Bissett Creek Graphite Mine Closure Plan or provide any other permits or authorizations to the project proponent until such time as it can be demonstrated that the public has been consulted in a meaningful fashion. This could be accomplished by placing all the documents related to the project, including the full closure plan, on the Environmental Registry for a consultation period of not less than 30 days and that the proponent and Ministry of Mines and Northern Development accept to meet with individuals and groups to be made aware of concerns with respect to the project.

Moreover, given the location of the proposed mine in relation to several parks and a major wetland complex, we will be requesting that the Ontario Ministry of the Environment designate this project for an individual environmental assessment under the Ontario Environmental Assessment Act. It is our understanding that several other mining projects in the province have voluntarily agreed to subject themselves to this process and we would urge the proponent to follow suit.

We remain available to meet with you and/or the proponent to discuss our concerns in greater detail.

Sincerely,

John McDonnell

John McDonnell,
Executive Director
CPAWS Ottawa Valley

CC:

- Honourable Jim Bradley, Minister of the Environment
- Environmental Commissioner of Ontario
- Ministry of the Environment (Approvals Branch)
- Northern Graphite Corporation

