# The KGHM Ajax Mine Proposal Policy Analysis and Brief

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# **Preface**

This report is written by Quinn Runkle, BA Geography (Environment and Sustainability) 2013, for GEOG 419 (Research in Environmental Geography). This research-intensive course partners students with community partners and, in this case, the community partner is the Green Party of British Columbia. In writing this paper, Quinn Runkle does not have any formal political affiliation with the Green Party.

# **Executive Summary**

The Green Party of British Columbia (GPBC) uses its "Ten Green Principles" as a filter to determine its support or opposition to any given policy or project proposal. This report utilizes the Ten Principles to determine the GPBC stance on the proposed KGHM Ajax Mine (KAM) project in Kamloops, BC. KGHM International Ltd. operates in Canada, the USA, and Mexico and is pursuing a 25 square-kilometre gold-copper mine in Kamloops, a city of 87,000 in BC's South-Central Interior. This report recommends that the GPBC oppose the KAM proposal because it meets only two of the Ten Principles. Given that a New Democratic Party majority government is likely after the upcoming BC Provincial Election, the GPBC should consider possible political concessions to pursue if the NDP were to support the KAM project. The NDP has yet to state its formal position. These concessions include the following: firstly, a greater percent of profits should be shared locally; secondly, local residents should receive sufficient job training so as to be able to gain employment offered by the mine; and thirdly, further research must be conducted into the possible human health and environmental impacts of the mine. More importantly, the GPBC Kamloops-North Thompson candidate (who, as of submission, is yet to be determined) should use his/her political leverage to assist local community members in opposing the mine. The GPBC should pursue investments in sustainable development projects as an economic alternative to such projects.

# **Research Question**

Should the Green Party of British Columbia support or oppose the KGHM Ajax Mine?

# I. Introduction

KGHM International Ltd. has proposed the construction of a gold and copper mine in Kamloops, British Columbia. As with any resource extraction project, there are many different factors at play when analyzing its impacts. The needs of local residents, environmental wellbeing, and economic prosperity are important to consider in determining whether the Green Party of British Columbia (GPBC) should support or oppose the KGHM Ajax Mine (KAM). The KAM proposal has garnered intense local opposition due to concerns around possible environmental harm and its close proximity to neighbourhoods and schools. On the other hand, some residents are in support because of future employment opportunities and potential economic growth. As a provincial political party, it is critical that the GPBC determine its position on such matters with a thoughtful, transparent, and methodical approach.

The GPBC uses its "Ten Green Principles" as a filter through which all policies and projects must pass to gain the party's support (Green Party of BC 2010). For the purpose of this analysis, a rubric has been designed to evaluate the KAM Proposal. Such a rubric can also be easily replicated to evaluate future projects. Through this rubric, an unbiased and practical approach was taken to analyze this complex and politically-salient issue so as to determine a recommendation for the GPBC position.

This analysis concludes that the GPBC should oppose the KAM proposal because its development fulfills only two of the Ten Principles. The following report will demonstrate how this conclusion was drawn. This will provide the Party with: an overview of KGHM International Ltd., the KAM proposal, and the city of Kamloops; an in-depth analysis of the project; a review of the analysis in relation to the Ten Principles (divided into environmental, social, and economic sustainability); a political analysis; and recommendations.

## II. Overview

### **KGHM International Ltd.**

Quadra FNX Mining Ltd. was renamed KGHM International Ltd. after becoming a subsidiary of KGHM Polska Miedz S.A. on March 7<sup>th</sup>, 2012 (KGHM Polska Miedz S.A. 2013). KGHM International Ltd. Operates mines in Ontario, Canada; Arizona and Nevada, USA; and Chile (Stock Research Portal 2012). These copper, silver, and gold mines around the world produce materials for "electrical, electronics, and automotive industries as well as in power generation and construction" (KGHM Polska Miedz S.A. 2013). Its parent company, KGHM Polska Miedz S.A. is based out of Poland. KGHM Polska's environmental record recently came into question when it was ranked as the absolute worst of the 300 carbon polluters in Europe (Environmental Investment Organisation 2011, 9).

# **Ajax Mine Proposal**

The KGHM Ajax Mine (KAM) proposal is for an open-pit copper-gold mine in Kamloops,

British Columbia and would be 25 square kilometres with a depth of about 1600 feet (KGHM)

International 2012). As shown in Figure 1, the mine would be partially located within the Kamloops city limits and within 1500 metres of an elementary school and many homes (Wardrop 2012). In addition, the nearby Inx and Jacko lakes would be completely destroyed during the construction phase of the mine (Wardrop 2012).

KGHM International Ltd. has determined that the mine will have a 23-year lifetime and extract 109 million pounds of copper and 99,000 ounces of gold annually (Wardrop 2012).

During this period, the KAM project will offer 380 jobs and promises to spend \$180 million annually in the community (KGHM International Ltd 2013).

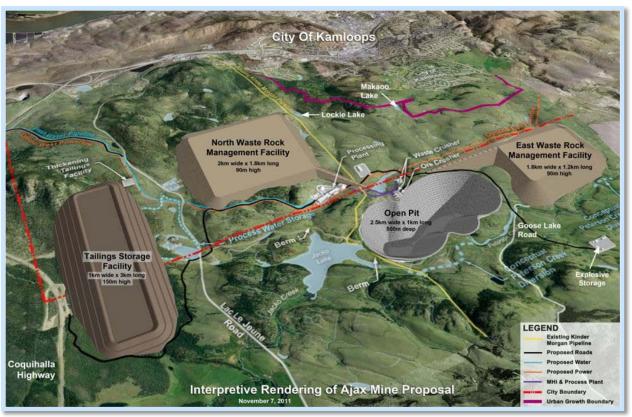


Figure 1: Ajax Mine Location (Mine 2011)

There are serious local concerns and benefits to be considered with regard to the environmental, social, and economic sustainability of such a project. These will be discussed in further detail in the analysis section.

# The City of Kamloops



Figure 2: Kamloops, BC Location (Success Promotions Inc 2013)

The city of Kamloops has a population of approximately 87,000 and is located in the South-Central British Columbia, as shown in Figure 2 (CityStats 2009). The economy in Kamloops is primarily based around tourism and resource processing. The city prides itself in its status of "Tournament Capital of Canada" which brings in an annual profit of \$11.7 million (City of Kamloops 2013). The "tournament capital" reputation is a promotional initiative by the City of Kamloops which has invested in sporting infrastructure (such as an aquatic centre, fields, and arenas) (City of Kamloops 2013). This is meant to attract activity related to a variety of

recreational and athletic events. The resource processing industries include a pulp mill, cement manufacturing, and the Highland Valley Copper Mine which is located outside of the city in the nearby community of Logan Lake (CityStats 2009). Another significant contributor to the local economy is Thompson Rivers University, home to 10,000 students as well as faculty and staff (Thompson Rivers University 2013). The largest employer in Kamloops is the Royal Inland Hospital (Plausinis 2012). The workforce in Kamloops currently employs 50,000 individuals and has an unemployment rate of 6% (equivalent to BC) (CityStats 2009).

The BC Provincial Government's initial review process allowed for public comments on the KAM project. The overwhelming majority of contributions from members of the community were in strong opposition to the mine, raising concerns such as: economic benefits vs. costs; health impacts; loss of local species, waterways (rivers, streams, and lakes), and endangered grasslands; impact to esthetic values of Kamloops and, therefore, tourism; loss of grazing lands for cattle; and decreased property values.

### III. Method

The GPBC uses its "Ten Green Principles" a guide for determining all party decisions.

This means that the proposal for projects such as KAM must fulfill a sufficient number of standards to receive the support of the GPBC. The principles are somewhat abstract in their definition and, therefore, a rubric has been developed in this study. Through a review of current methods for environmental assessment, a binary yes/no question has been written to represent each of the Ten Principles. This will allow the GPBC to compare other resource-based projects to its principles so as to determine support or opposition. This rubric is explained in

detail in Appendix II. Research was conducted primarily through company and government reports. A review of all public comments given between June 12, 2011 and March 20, 2012 was also conducted and used to inform the study of general public sentiments with regard to the project.

# IV. Analysis

As previously stated, all GPBC decisions must filter through the "10 Green Principles. For the GPBC, "sustainability" is the most central principle. The party states that "[sustainability] is really the heart of British Columbia's Green Party thinking." (Green Party of BC 2010). With sustainability as a central focus, the remaining nine principles were divided into the traditional three spheres of sustainability (environmental, social, and economic) for the analysis. This division of the ten principles is shown in Figure 3. The full rubric of all principles which was created for the GPBC and used in the analysis of the KAM proposal is located in Appendix II.



Figure 3: the Ten GPBC Principles sorted by Environmental, Social, and Economic Sustainability

# **Environmental Sustainability**

Related to GPBC Principles of Ecological Wisdom and Personal & Global Responsibility

Environmental sustainability is one of the central concerns discussed by the public in opposition to this project. As with any mining project, there are significant environmental risks associated with KAM's development. The project is in the midst of the Environmental Assessment (EA) process which is expected to be complete by the end of September 2013 (KGHM International Ajax Project 2013). It is presently in the Pre-Application phase, as shown in Figure 7 in the Appendix. The Auditor General of BC published an audit of the EA process in July 2011 which expressed concern around insufficient oversight, ineffective evaluation of mitigation measures, and unaccountable information provided to the public (Doyle, An Audit of the Environmental Assessment Office's Oversight of Certified Projects 2011). The report also addresses the fact that only 0.5% of projects have ever been denied certification through the EA process, as shown in Figure 4.

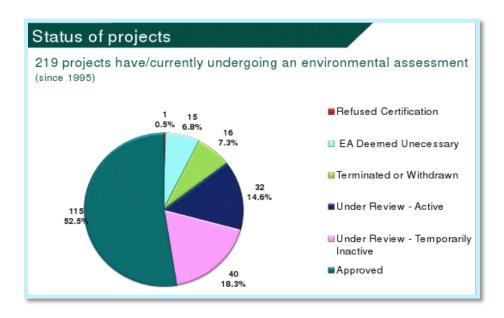


Figure 4: Project Approval/Refusal in EA Process (Doyle, Office of the Auditor General of British Columbia 2011)

Since that time, the Provincial Government has also effectively merged the Provincial EA with the Federal Government's EA process. Essentially, this has relinquished the Province's decision making ability to the Federal government (The Canadian Press 2013).

Furthermore, there are risks with regard to the physical environmental impacts in the region. Specifically, Inx and Jacko Lakes would be completely destroyed during the construction of the KAM and irreversible damage would occur to the unique and endangered grasslands in the region (Wardrop 2012). During the mining process, blasts release dust into the air and water (Environment Australia 1998). This dust contains metal alloys which pose a significant risk to animal and human health (Plausinis 2012). The metal alloys in lakes and rivers can also have a negative effect to salmon populations which is a local concern due to the popularity of salmon fishing as a leisure activity (Plausinis 2012). Of course, environmental impacts play a role in human health, too, which is discussed in the next section.

### **Social Sustainability**

Related to GPBC Principles of Social Justice, Non Violence, Gender Equality, Diversity, Grassroots

Democracy, and Decentralization

As noted above, six of the ten GPBC principles are related to social sustainability which makes it one of the key factors in GPBBC decision making whilst also being one of the most difficult to measure. KGHM International Ltd. highlights a desire for diversity in its hiring structure (KGHM International Ltd 2013). This could be representative of a more progressive outlook on social sustainability however its true interactions with the community seem to be lacking in this regard.

Below is a collection of public comments, both in opposition and in support of the mine, but in general most comments were in opposition. These are also included in full form in Appendix V.

In Support	In Opposition
"I am thankful that Ajax is coming to	"When it comes to economic growth for the city of
Kamloops. Our city needs companies that	Kamloops, the proposed Ajax mine appears to be a great
create jobs for local residents."	idea [] but when it comes to looking at the issue of long
Dale C Sherstobitoff - Kamloops, British	term environment impacts that the mine would have,
Columbia (BC Environmental Assessment	the mine is no longer such a good choice." (BC
Office 2012)	Environmental Assessment Office 2012)
"I am particularly interested in seeing the estimated effect of the mine with regard to fostering economic diversification, and to	"[It is] Fathers Day today that I am writing youas I am very concerned about the future legacy for my son, grandson and hopefully his family in the future." (BC
providing benefits to Canadians."	Environmental Assessment Office 2012)
Les Laithwaite - Kamloops, British Columbia	
(BC Environmental Assessment Office 2012)	
	"I am totally opposed to the Ajax mine. []The risk of air
	shed, water and ground contamination is too great."
	Ed Biberdorf - Kamloops, British Columbia (BC
	Environmental Assessment Office 2012)
	"This mine is simply too close to Kamloops. [] Please do
	not destroy a part of my city out of greed."
	Tyler Mann - Aberdeen, British Columbia (BC
	Environmental Assessment Office 2012)

Generally, the public sees the debate as striking a balance between jobs and economic growth and, on the other hand, environmental protection and human health. There are serious health risks associated with the development of a mine in such close proximity to residential areas. The metal alloys in the air and water can exacerbate the effects of respiratory illnesses such as asthma (Plausinis 2012). One additional concern is expressed through a survey of 150 doctors 70% stated that they would not consider Kamloops an option if they were looking for work due to the proposed construction of the mine and 84% stated that they were "concerned about the potential health impacts of the Ajax Mine on the people of Kamloops" (Plausinis

2012). Given that the Royal Inland Hospital is Kamloops largest employer, this risk of doctors relocating or not settling in Kamloops could be of grave concern to the health in the region and also to the local economy (Plausinis 2012). Additional research regarding the risks to human health is necessary.

Human wellbeing through recreation is also a component of social sustainability. Inx and Jacko lakes are popular fishing destinations and, as previously noted, would be destroyed through the mine's construction. In addition, the aesthetic value of Kamloops would be decreased due to the waste mounds which would be located beside the main road into Kamloops and, at a height of 150 metres, would tower over neighbouring buildings (Wardrop 2012). These aesthetic concerns could also affect property values.

The GPBC principles of Social Sustainability and Grassroots Democracy (definitions in the Appendix II) are certainly not met considering that the Mineral Tenure Act of BC allows Federal and Provincial governments to override the opinions of local, regional, and First Nations governments (Ministry of Energy, Mines, and Natural Gas 1996). This completely undermines the local opposition to the project.

Additionally, as a multi-national corporation (MNC), KGHM International Ltd. may be difficult to hold accountable when it comes to employment of foreign labour or clean-up efforts after the mine's lifetime comes to an end. While the company is too young to have any clean-ups in its own track record, similar mines operated by MNCs in Ontario have demonstrated these concerns (Kerr 2012).

The social sustainability of the mine is greatly in question because of an inability of local residents to influence the activities taking place in their community, risks to human health and wellbeing, and concerns with MNCs.

# **Economic Sustainability**

Related to GPBC Principle of Community Based Economy

The Economic Sustainability of the KAM project can be seen as a balancing act. The economic benefits are commonly seen as the most prominent reason to support the project. KGHM promises 380 permanent jobs for the 23 year lifetime of the mine (KGHM International Ltd 2013). The average wage in a mining job is about \$100,000 per year meaning that such positions are highly lucrative and would bring immense economic benefits to the individuals employed at the mine, their families, and the local economy as a whole. At present, the workforce in Kamloops is 50,000 and so while 380 jobs is a large number, it does not represent a huge percentage of potential positions in the community (CityStats 2009). As well, looking at jobs is only one side of the economic image.

There are possible negative economic impacts associated with the KAM project. The aesthetic degradation could have negative consequences on property value and tourism. Mine tailings ponds would be located within 1500 metres of an elementary school and of many homes. Additionally, the status of "Canada's Tournament Capital" could be negatively impacted and this presently contributes \$11.7 million annually to the local economy (City of Kamloops 2013). As well, only 12% of mining revenue stays within the municipality whilst the rest is taken through taxes to the Provincial and Federal government (KGHM International Ltd 2013).

As is the norm with raw resource industries, market volatility poses a risk to consistency in economic growth. When operating under the name Quadra FNX from 2010-2012, the company had the significant variability in stock prices. This unpredictability, as demonstrated in Figure 5, in the market can cause difficulties for local communities who depend on consistent employment.

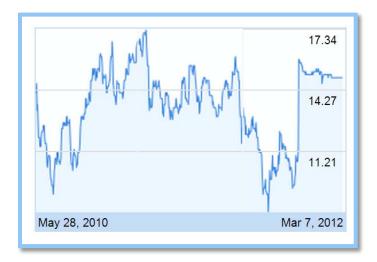


Figure 5: Quadra FNX Historical Chart of Daily Stock Prices (Google Finance 2012)

The parent company, KGHM Polska, has a very poor environmental record and so there are fears that the promised restoration of the land after mine closure may not occur (Environmental Investment Organisation 2011). The risk of the municipality having to cover costs of clean-up and restoration must be considered in the KAM proposal's economic sustainability.

# **V. Political Analysis**

The Kamloops-North Thompson riding has been held by a BC Liberal MLA since 1996. At present the MLA is Terry Lake, the Minister of the Environment for the Liberal Government. In

the 2009 Provincial Election, Lake beat BC New Democratic Party candidate Doug Brown by just 510 votes (47% and 45% respectfully) while GPBC candidate, April Snowe, earned 1418 votes (7% of total) (Elections BC 2009). This creates an interesting political dynamic in anticipation of the Provincial Election on May 14<sup>th</sup>, 2013. The projected election results are for a strong NDP win and so political changes province-wide can certainly be expected (Grenier 2012).

The impacts of such an election result would depend upon the NDP's stance on the KAM proposal. The NDP has expressed a desire to see further research, and the completion of the EA process before making a firm decision. Although a formal position has not been announced, the NDP issued a statement on November 2<sup>nd</sup>, 2011 calling upon MLA Lake to "stand with Kamloops Community on Ajax Mine Assessment" (BC NDP 2011). This implied that the NDP would be in opposition to the mine proposal. Nevertheless, it is critical that the GPBC consider what concessions could be pursued if the KAM project were to go forward. These concessions are discussed in the recommendations section below.

## **VI. Recommendations**

This report recommends that the GPBC oppose the KAM project because eight of the Ten Green Principles are not fulfilled (as shown in Appendix II). The GPBC as a whole and the candidate in the Kamloops-North Thompson riding (when determined) should openly and vocally oppose the mine. The candidate should use his/her political influence to assist local community members in opposing the mine. As an economic alternative, the GPBC should pursue investments in sustainable development projects.

In conjunction with the 10 GPBC Principles, there are also several political concessions that could be pursued if the mine were to go forward. Firstly, as is discussed in the party's desire for Community Based Economy, a greater percent of profits should be shared locally. Secondly, local residents should receive sufficient job training to be able to gain the lucrative employment offered by the mine. This could be done through subsidizing the mining classes already offered at Thompson Rivers University in Kamloops. Thirdly, further research must be conducted into the possible human and environmental health effects of the mine. At present, there are significant concerns related to the KAM project, especially with regard to metal alloys in the water and the air and so this needs to be studied in a scientific report before the project moves forward. These concessions would move the KAM project closer to meeting the GPBC's Ten Principles and would therefore improve the extent to which the GPBC could support the mine. However, these concessions would in no way take the party to a point of supporting the mine.

# VII. Further Research Opportunities

There are many opportunities for further research to build upon the concepts developed in this project. For the GPBC, the most important step would be furthering the rubric which has been outlined in Appendix II. The binary question method was developed to ensure that the process of assessment was simple, easy-to-follow, and completely transparent.

Options should be explored for creating a gradient system through future research and development of the GPBC's Ten Principles. A gradient system could include a ranking or grading system and should also allow different principles to carry different weights depending on the

project. Additionally, a decision on how many principles must be met to receive approval is necessary moving forward. For example, had this project met half of the principles, would it have been accepted or rejected? These further opportunities will allow the Party to strengthen the rubric provided in this project and further develop the transparent, accountable, and measured approach which the GPBC strives for when making such important decisions.

# **VIII. Conclusion**

The GPBC should oppose the KGHM Ajax Mine proposal because it fails to meet the requirements for eight of the Ten Green Principles. The environmental, social, and economic impacts are far too great. This report recommends that the GPBC oppose the KAM project as well as have the GPBC Kamloops-North Thompson candidate (who, as of April 1, 2013 is yet to be determined) should use his/her political sway to assist local community members in opposing the mine. As an economic alternative, the GPBC should pursue investments in sustainable development projects. In the political realm, there are concessions that the Party could pursue if the project were to move forward. These include: having a greater percent of profits shared locally, providing subsidized courses to locals to make employment more accessible, and conducting further research on possible health effects of metal alloys in water and air. This report has strived to dissect the intricacies of a controversial resource extraction project in a transparent and meaningful way. As a provincial political party, it is critical that the GPBC use such methodology for not only the KAM proposal but also for future projects.

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# **Appendix**

# I. The GPBC's 10 Principles

The core principle for the GPBC is sustainability. As said by the GPBC, "This is really the heart of British Columbia's Green Party thinking. We must consider the welfare of our descendants, for at least seven generations, if we are to be wise stewards of the earth" (Green Party of BC 2010). Sustainability is traditionally defined in terms of Environmental, Social, and Economic Sustainability and therefore the Ten Principles have been grouped according to these themes for the central analysis, as seen in Figure 6. The entire rubric is broken down on the following page.



Figure 6: Sorting the 10 Green Principles in Environmental, Social, and Economic Sustainability

# II. Principles Analysis Rubric

	GPBC Definition	Rubric Question	Reasons	Conclusion
Ecological Wisdom	"The earth sustains all life forms. Whatever we do to the earth we do to ourselves."	Does the project have a neutral or positive impact the local and global physical environment?	<ul> <li>Irreversible damage to unique and endangered grasslands</li> <li>Risks of air and water pollution from chemical dust; risks to salmon species</li> <li>Inx and Jacko Lakes will be destroyed</li> </ul>	No
Personal & Global	"Global sustainability and international justice can only be achieved when responsibility is shared at all levels of society."	Is responsibility (including both positive and negative outcomes) for the project shared among municipal, provincial, and national governments and corporations?	<ul> <li>BC Auditor General has expressed concern for inadequate monitoring processes</li> <li>No public forum regarding the specifics of the environmental assessment</li> </ul>	No
Social Justice	"The worldwide increase in poverty and inequity is unacceptable. All must be able to fulfill their potential regardless of gender, race, citizenship, or sexual identity."	Are all persons supported regardless of gender, race, citizenship, or sexual identity with regard to employment AND impacts of the project?	<ul> <li>Hiring structure highlights desire for "previous exposure to other cultures and languages"</li> <li>No apparent structural inequity</li> </ul>	Yes
Non-Violence	"We all know in this complicated world there are times when we may be called to arms, but we will maintain that violence is almost always self- defeating, and always the very, very last choice. We must work to end war, and	Is this project committed to developing without any acts of violence (through warfare or crime)?	<ul> <li>There are no anticipated acts of violence associated with this project</li> </ul>	Yes

	eliminate the root causes of crime."			
Gender Equality	"The ethics of cooperation and understanding must replace the values of domination and control."	Are community consultations and stake holder engagements conducted with a mentality of cooperation and understanding (as demonstrated through meaningful dialogue and openness)?	<ul> <li>Community consultations have already shown to be restrictive</li> <li>City councillors have expressed concern for apparent lack of meaningful dialogue</li> <li>RCMP have been called to restrict access to consultations</li> </ul>	No
Diversity	"We celebrate the biological diversity of the earth and the cultural, sexual, and spiritual diversity of the human race."	Does the project protect biological and human diversity?	<ul> <li>Biological diversity will be irreparably damaged through the construction of the mine site</li> <li>Clean up and restoration has been shown through other case studies to often be insufficient</li> <li>KGHM does not explicitly state hiring specifics with regard to human diversity</li> </ul>	No
Grassroots Democracy	"Every human being deserves a say in the decisions that affect their lives and not be subject to the will of another. We will work to increase public participation at every level by directly including citizens in decision-making processes."	Do the citizens directly impacted by the project have the ability to play a role in the decision making process?	<ul> <li>The Mine Tenure Act gives Federal and Provincial governments the ability to override opinions of local, regional, and First Nations governments</li> </ul>	No

Decentralization	"The people most affected by a problem must have the authority to solve it. Distant administrations cannot be responsive. Power must be returned to local communities."	Do the citizens directly impacted by the project have the ability to problem solve locally?	<ul> <li>KGHM is a multi-national corporation</li> <li>Other cases have shown companies like KGHM abandon the mine site after production is complete leaving tax payers to pay for clean up</li> </ul>	No
Community Based Economy	"Rather than people being subservient to the economy, the economy should provide for human needs within the natural limits of the earth. Local self-reliance to the greatest practical extent is the best way to achieve this goal.	Is the local community able to determine how development takes place in the region?	<ul> <li>380 jobs initially but with the intention of mechanizing many processes</li> <li>Negative impacts anticipated to the current status of "Canada's Tournament Capital"</li> <li>Mine tailings ponds will be located within 1500m of an elementary school and homes</li> </ul>	No
Sustainability	"This is really the heart of British Columbia's Green Party thinking. We must consider the welfare of our descendants, for at least seven generations, if we are to be wise stewards of the earth."	Does the project foster and protect environmental, social, and economic sustainability in such a way that at least seven future generations' wellbeing is protected?	<ul> <li>Irreparable damage to physical environment (grasslands, rivers, lakes)</li> <li>Human health at risk due to heavy metal assays in water and air</li> <li>Local governments and citizens are not sufficiently included in the process</li> <li>Economic benefits &lt; economic costs (tourism, "Tournament Capital", schools, homes)</li> </ul>	No

### III. Environmental Assessment Process in BC

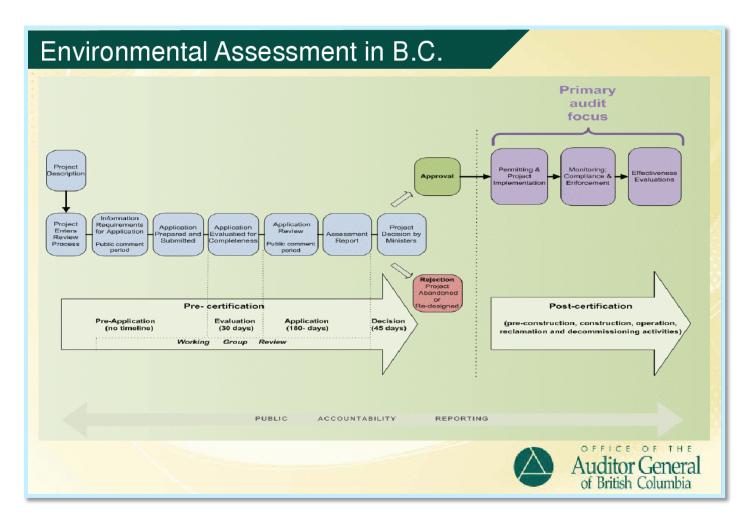


Figure 7: Environmental Assessment Process (Doyle, Office of the Auditor General of British Columbia 2011)

## **IV. Analysis Summary**

- 1. Ecological Wisdom No
- 2. Personal & Global Responsibility No
- 3. Social Justice Yes
- 4. Non-Violence Yes
- 5. Gender Equality No
- 6. Diversity No
- 7. Grass Roots Democracy No
- 8. Decentralization No
- 9. Community Based Economy No
- 10. Sustainability No

### V. Public Comments

### **Public Comments in Opposition**

"When it comes to economic growth for the city of Kamloops, the proposed Ajax mine appears to be a great idea. The creation of new jobs would benefit numerous people in our city for the proposed mine life of 23 years. But when it comes to looking at the issue of long term environment impacts that the mine would have, the mine is no longer such a good choice." (BC Environmental Assessment Office 2012)

"This mine is simply too close to Kamloops. I think it should be moved further from the city limits. There is nothing wrong with mining, but, it should be done a reasonable distance from major towns. I was born in Kamloops and have lived here for 33 years. Please do not destroy a part of my city out of greed. – Tyler Mann, Aberdeen BC" (BC Environmental Assessment Office 2012)

"I am totally opposed to the Ajax mine. This proposed mine is too close to the city of Kamloops.

The risk of air shed, water and ground contamination is too great. - Ed Biberdorf, Kamloops BC"

(BC Environmental Assessment Office 2012)

"[It is] Fathers Day today that I am writing you ...as I am very concerned about the future legacy for my son, grandson and hopefully his family in the future." (BC Environmental Assessment Office 2012)

### **Public Comments in Support**

(BC Environmental Assessment Office 2012)

"I am particularly interested in seeing the estimated effect of the mine with regard to fostering economic diversification, and to providing benefits to Canadians. I am concerned the Kamloops and area economy is becoming more dependent on tax payer supported institutions (e.g. TRU) and facilities (e.g. tournament capital facility maintenance and branding). At the same time there are those in the community that have little regard for or support of tax generating businesses (e.g. Ajax) that could offset these costs. I see the mine as potentially helping maintain economic diversity in the region. I also believe the economic value of "the tournament capital" brand is over emphasized; I would appreciate an estimate of its value included in the review. - Les Laithwaite - Kamloops, BC" (BC Environmental Assessment Office 2012) "I am thankful that Ajax is coming to Kamloops. Our city needs companies that create jobs for local residents. So many bankruptcies, people losing their homes or having to travel to other provinces and other countries to work. It's about time we boost our own economy and create jobs for people in Kamloops. This is not the 1800's the mines are responsible and always strive to protect the environment. They have policies and procedures that must be abided by. Health and Safety and the Environment is their main concern. - Dale C Sherstobitoff - Kamloops, BC"