

January 31, 2023

Minister of Environment & Climate Change  
Nova Scotia Environment  
PO Box 442 Halifax NS  
B3J 2P8

**RE: Donkin Mine Industrial Approval Reconsideration**

To the Honourable Tim Halman:

We are writing to you in support of the Sierra Club of Canada’s appeal regarding the renewed industrial approval granted to Kameron Coal Management Limited, on behalf of the Nova Scotia Regional Committee of the Canadian Association of Physicians for the Environment (CAPE NS). We are a group of around 70 professionals across the spectrum of health care, including physicians, nurses, medical and nursing students, laboratory technologists, counselors, scientists, and others.

As health care professionals we deeply appreciate the government’s commitment to make health care for Nova Scotians a priority, and the government’s significant efforts in this regard to date. However, we were surprised and deeply concerned about the renewed industrial approval granted to Kameron Coal for reasons stated below, and implore the government to reconsider in keeping the health of Nova Scotians front of mind.

Occupational hazards of coal mining are well known and include pulmonary diseases—including coal workers’ pneumoconiosis, chronic obstructive pulmonary disease, silicosis and other diseases—that can bring about disability and premature death [1]. There is also consistent evidence associating coal mining with a wide spectrum of diseases in populations who live and work in close proximity to these mines [2].

We are concerned that Kameron Coal has not sufficiently considered the health of workers and local communities in its operations. The mine was closed citing geological conditions that made the mine unsafe. These conditions have not changed and, after reopening the past September, the site incurred 14 warnings, 19 compliance orders, and 8 administrative penalties or fines [3]. Moreover, operating the mine produces noise pollution which has degraded Port Morien residents' quality of life, particularly in regards to sleep deprivation.

Beyond the direct effects on coal miners’ health and the health of people living in the area, climate change has far-reaching effects on the health of populations in Nova Scotia and around the globe [4]. Climate change has negative effects on many metrics that will affect quality of life and the Nova Scotian economy. The costs of climate mitigation—such as management and recovery from sea level rise, increasingly common floods, and intense weather events like tropical storm Fiona—need to be considered when projects like the Donkin coal mine are evaluated.

The argument may be made that metallurgic coal is necessary for steel production and this form of coal will be used regardless of where it is mined, so why not mine it in Nova Scotia and create 150 jobs? This is a regressive argument considering that this underground mine will create far greater methane emissions than above ground mines elsewhere [5], and that green steel making alternatives such as hydrogen are currently under development [6]. There is a reason Donkin coal is the only underground coal mine still active in Nova Scotia and Canada; progressive policies must be considered by our government. There are many ways that the economy of Cape Breton can be supported with investments in green energy and other government initiatives that would cause less harm to the environment and population health.

Will Nova Scotia look to the future with progressive policies or continue to allow corporations to contribute to declines in the health of our environment and health of Nova Scotians? Please reconsider the approval of the Donkin coal mine. CAPE NS hopes to work collaboratively with the government of Nova Scotia on this and other important initiatives.

Sincerely,



Laurette Geldenhuys, MBBCH, FFPATH, MMED, FRCPC, MAEd, FCAP

Chair, CAPE NS

## References

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3. E. Pottie. "Cape Breton's Donkin coal mine fined for safety violations after fall reopening." [www.cbc.ca](http://www.cbc.ca). (accessed January 28, 2023)
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6. The European Parliament. "The potential of hydrogen for decarbonising steel production". [www.europarl.europa.eu](http://www.europarl.europa.eu). (accessed January 28, 2023)