

OUR LAND IS OUR FUTURE

UNION OF BRITISH COLUMBIA INDIAN CHIEFS

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April 1, 2019

Brian Kynoch, President
Don Parson, Chief Operating Officer
Imperial Metals Corporation
580 Hornby Street, Suite 200
Vancouver, BC V6C 3B6
Via email: inquiries@imperialmetals.com

RE: Imperial Metals' Application for Exploratory Mining Permit in Skagit River

Dear Brian Kynoch, President of Imperial Metals and Don Parsons, Chief Operating Officer:

The Union of BC Indian Chiefs (UBCIC) writes to express our grave concern about Imperial Metals' current application for an exploratory mining permit in the headwaters of the Skagit River. This permit represents Imperial Metals' continued lack of concern for the welfare of the environment and the concerns of First Nations; it signifies the privileging of corporate investments over the conservation of the Skagit River and the protection of the abundance of vulnerable wildlife populations in the Upper Skagit region.

Above all, it is highly alarming that a company with an operating history mired by the 2014 Mount Polley tailings breach not only continues to seek a discharge effluent permit for the Mount Polley mine, but a permit that could open the gateway to another out of compliance mining operation. UBCIC, concerned First Nations and conservationists from Canada and the U.S. do not want a repeat of Mount Polley: the continued corporate evasion of accountability and disciplinary action, and the complete disregard for the First Nations impacted and still recovering from the catastrophe.

UBCIC's submission to the United Nations Special Rapporteur's Report on Natural Resource Extraction and Racial Discrimination pointed to how natural resource extraction projects such as the Mount Polley Mine systemically violate Indigenous Title and Rights while allowing corporations to operate with little supervision from the State. In line with this report and UBCIC's Resolution 2011-22 that outlined the need for mining policy to be overhauled to fully respect First Nation Title and Rights, UBCIC urges Imperial Metals to honor the *United Nations Declaration on the Rights of Indigenous Peoples*, the most comprehensive international human

rights instrument addressing the welfare and rights of Indigenous Peoples. As your company seeks to begin drilling for mineral deposits in the Skagit River watershed, it is imperative your actions do not contravene or undermine the *UN Declaration*, including Article 29 which affirms that Indigenous peoples have the right to protect and conserve the environment and the productive capacity of their lands, territories, and resources, and to have their right to free, prior and informed consent consistently honoured. It is unacceptable for Imperial Metals to carry out any operations or actions that are not premised on full engagement and consultation with concerned First Nation parties.

One of our key concerns is the potential damage Imperial Metals stands to inflict upon a region that is home to vulnerable ecosystems and that has already been besieged by BC led logging operations. As your company holds most of the mining tenures in the so-called “donut hole,” the 5,800-hectare area of unprotected forests and mountains surrounded by Manning and Skagit Provincial Parks, we urge you to protect and help recover endangered populations of bull trout, chinook salmon and steelhead. It is essential that you uphold the integrity of a watershed that is critical to salmon populations and the people in Washington State that rely upon it for clean drinking water. The Skagit Environmental Endowment Commission (SEEC) has negotiated with Imperial Metals for years over your mining tenures, and we urge you to honor their mandate to conserve and protect the watershed and to acquire remaining mining and timber rights in order to acquire the protected status this region needs.

The Upper Skagit Tribe has already expressed concerns over the impacts mining could have on the Skagit River that is of utmost importance to their culture and livelihoods. The salmon and southern killer whales that are supported by this watershed are worth more than metal and toxic waste; they are a vital part of our cultures and should be appreciated by future generations to come. As evidenced by the Mount Polley Mine disaster, launching a gold and copper mine brings with it the associated risks of tailings pond spills and the leaching of heavy metals from these wastewater reservoirs. This is highly concerning given that copper is particularly lethal to salmon and injurious to their nervous systems; any lapses in mining operations may have catastrophic consequences for the aquatic ecosystems of the Skagit River.

Considering the significant environmental ramifications mining will have in this area, UBCIC calls upon you to keep the Skagit River watershed as a pristine region in which wildlife, flora, and life thrives. This unequivocally means ceding your mining tenures to the SEEC, ensuring First Nation Title, Rights, and concerns are recognized and heeded, and that further action is taken to ensure that oversight and accountability measures are in place in to prevent further negligence in your operations.

On behalf of the UNION OF BC INDIAN CHIEFS



Grand Chief Stewart Phillip
President



Kukpi7 Judy Wilson
Secretary-Treasurer

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CC: Scott Schuyler, Director of Natural Resources for Upper Skagit Tribe
UBCIC Chiefs Council
Chris Tunnoch, Manager, Strategic Initiatives, South Coast Region, Ministry of Forests,
Lands, Natural Resource Operations & Rural Development