

**Improving our language in describing disturbed sites that are planned for new development**

Proposing a new project at a site where past development has occurred is often seen as a preferable alternative to developing a new area. Some historic mine areas that were closed for economic reasons are now being considered for development again due to changing market conditions and increased scarcity of resources. The term “brownfield” is often used to describe these sites old, disturbed sites. This language, however, is inaccurate as previously developed areas where mining ceased decades ago are healing. In many cases vegetation has re-established. Wildlife and people have returned to use these areas. This paper suggests that improved language is needed to describe historic mine areas and other disturbed sites that are healing.

The Mackenzie Valley Impact Review Board is responsible for conducting environmental assessments of projects in the Mackenzie Valley region of the Northwest Territories, Canada. The territory has a long history of mining development.

Due to the remote setting in the Northwest Territories, mineral resources were sometimes left in the ground due to the high cost of production and transport or unfavourable market conditions at the time. In other cases, minerals that were not considered valuable at past mine sites are now being viewed with renewed interest. Examples include minerals that are now defined as critical, such as cobalt, lithium and rare earth minerals. For these reasons proponents have taken a renewed interest in old mine sites in the Northwest Territories. Decades have often passed in the time interval between the closure (or abandonment) of an old mine and the interest by mine proponents in re-development.

Proponents of new projects in the Northwest Territories are required to conduct community engagement early at the beginning of an environmental assessment. Many of these projects in environmental assessment are near Indigenous communities and all proposed projects are within the traditional territory of Indigenous Governments and First Nations organizations. The land where projects are proposed always has a long history of the use by Indigenous people whether the project is near existing communities, or in an area of current or traditional land uses.

During community engagement, proponents often describe the land where mining ceased decades ago but is planned for re-development again as “brownfield”. This language is used by proponents as a way to justify and soften the impacts of a new mine because it overlaps the area of an old mine.

In some cases, the rationale for re-development of an old, disturbed site makes sense. There are benefits to re-developing an old mine site compared with clearing unspoiled land and developing land that has no previous human disturbance. However, after decades of recovery,

the land at old mine sites often has a gradient of vegetation succession and re-use by wildlife and people. At some point in time after development stops, "brownfield" is no longer an accurate, appropriate or acceptable way to describe the on-going recovery of a disturbed site. The dominant colour at an old mine site may not be brown at all. In many cases these sites would be better described using terminology that incorporates various shades of green.

The way we describe the land has implications on how we treat it. Our language can grant different values to land and entitle it to different standards of treatment and care. There is a danger in using a term such as "brownfield" because it can justify or rationalize continued abuse of previously disturbed land even though it is recovering and healing.

In the Northwest Territories mine sites historically were often not closed or reclaimed to standards that are required today. Old mine sites often have waste rock piles, tailings facilities, access roads and open pits that were simply left to recover naturally and would not meet today's mine closure criteria.

After development stops and a mine is closed, natural processes begin to re-establish. There may be a range of recovery at a site, including colonizing plants and establishment of vegetation types over time. Water movement pattern will settle and eventually wildlife and people will return to the site.

The Mackenzie Valley Environmental Impact Review Board conducts community scoping meetings at the start of an environmental assessment. During community scoping meetings in Indigenous communities for a recent environment assessment for a new mine at an old mine site, community members spoke about the land and land uses at former mine sites. Activities at the disturbed site of a former project included harvesting wildlife and gathering plants.

Early engagement with communities can help identify uses of the land by wildlife and people at old mine sites. Project proponents and impact assessors should discuss current uses of previously disturbed sites if they are being considered as the location for new a new development. Proponents and project assessors of these sites should:

- ask whether fish, wildlife and birds have returned to a disturbed site
- ask if people have returned to use the site, for which activities, and during which times of the year
- ask if wildlife harvesting or gathering of plants has resumed
- not assume that wildlife and people do not use a previously disturbed mine site.

The language we use to describe the land is important. This is particularly the case during engagement in Indigenous communities where people may have memories of use of the land prior to past mine developments, loss of that land during the mining operations, and recovery of the land and use of the land after mine closure.

The way we describe the land has implications on how we treat it. The term "brownfield" may be inappropriate language for lands with past mine disturbance that are healing. How we describe the land should not be used to justify continued mistreatment of the land. There may be a gradient of revegetation of old mine sites and use of that land by wildlife and people that needs respectful language. Improved language is needed to describe the gradient of landscape change and current uses of past disturbed sites proposed for new development to acknowledge recovery and healing of the land.

**Disclaimer:** *This paper describes the author's perspectives based on experiences with the Mackenzie Valley Environmental Impact Review Board, but the views within are not necessarily shared by the Review Board.*

**Bio:**

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