

August 15, 2023

President Joe Biden
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

The Honorable Secretary Jennifer Granholm
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585
The.Secretary@hq.doe.gov

The Honorable Secretary Deb Haaland
U.S. Department of the Interior
1849 C Street, NW
Washington DC 20240
dhaaland@ios.doi.gov
shantha_alonso@ios.doi.gov

The Honorable Administrator Michael Regan
Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Ave., NW
Washington, DC 20460
Regan.Michael@epa.gov
triantafillou.kathy@epa.gov

RE: Department of Energy grant of \$114,846,344 to Talon Metals nickel sulfide ore mine

Dear President Biden, Secretary Granholm, Secretary Haaland, Administrator Regan,

The 80 undersigned non-governmental organizations across the United States write to express our concern with the premature federal decision to subsidize the nickel sulfide ore mining project known as the Talon Mine or Tamarack Mine, in the Mississippi River headwaters area of north central Minnesota. The mining project proposed on June 21, 2023 by the Rio Tinto corporation and its exploration and marketing partner, Talon Metals, requires a comprehensive environmental review and consent of affected tribal communities before it is subsidized or allowed to proceed.

In October 2022, even before the mine was formally proposed, the Department of Energy announced that it would grant [\\$114,846,344](#) to a mineral processing project in North Dakota.

This facility would process nickel ore from Talon’s proposed Tamarack nickel-copper-cobalt mine, a project that has raised significant tribal and community [concern](#).

We stand in support of tribal communities in the 1855 and 1854 treaty areas—homelands of Anishinaabe people—as well as other community members who have expressed their concerns about this project and their knowledge about the known risks of this mine. We share an understanding that clean water and the quality of our natural environment are critical to all, to our way of life, and to a healthy and sustainable economy.

Awarding federal tax dollars to controversial high-risk mineral processing projects prior to the initiation of environmental review or tribal consultations undermines the safety and sovereignty of Native communities. This \$115 million federal subsidy undermines an objective and scientific assessment of the adverse environmental impacts of the mine necessary to determine whether a mine should even be permitted. Talon Metals and mining proponents have used the federal subsidy to claim that existing federal and state environmental reviews should be circumvented in the name of climate action.

In fact, the Talon Metals nickel sulfide ore mine is not needed to advance electric vehicle production. Most electric vehicle battery manufacturing increasingly relies on diverse mineral sources, including reused and recycled materials. The single company that has committed to purchasing the processed ore from the Tamarack mine—Tesla—has itself announced plans to reduce its reliance on nickel-based batteries.

At this point, there is no tribal or community consent to the Talon mine project, which would not provide a sustainable economic future for the region. Instead, it threatens to compound existing environmental and economic burdens facing Native and rural communities. The proposed Talon Metals / Rio Tinto mining project would be carried out by a company that has been accused of [environmental and human rights abuses](#) around the globe, and is sited in an area with invaluable cultural, environmental, and economic resources, including:

- Manoomin, a sacred food and staple of a sustainable Anishinaabe economy.
- Rare peatland and forested wetlands that sequester carbon and provide other unique ecological benefits.
- High value recreation lakes, the federally protected Saint Croix National Scenic Riverway, and the headwaters of the Mississippi River, the source of drinking water for millions.
- Rice Lake National Wildlife Refuge, a federally protected place that is also sacred to Anishinaabe people, and provides critical habitat to migratory birds and other wildlife.

- Big Sandy Lake, which is not only a high value recreation lake, but the site of a historic tragedy and loss of Anishinaabe life brought on by the actions of the federal government.

A just transition to safe and sustainable energy demands that we protect land, water, and natural carbon sinks. Federal policy should invest in [comprehensive transportation planning](#) including mass transit, and encourage battery development focused on [reuse and recycling of already-mined minerals](#) and e-waste as well as emerging, more sustainable technologies.

We call on the Biden Administration to take the following steps:

- Commit that none of the Department of Energy’s \$115 million for Talon Metals will be released unless and until tribal consultation, environmental review, and any resulting permitting processes are complete, and tribes confirm that their consent has been obtained.
- Commit that a federal environmental impact statement shall be prepared reflecting cumulative impacts of all reasonably foreseeable mining of the entire Tamarack Intrusive Complex mineral body on wetlands, streams, and lakes, the Mississippi River and St. Croix River watersheds, and 1855 and 1854 Treaty area resources.
- Commit that no cultural resources surveys or analyses shall be deemed complete unless all affected tribes review and confirm their adequacy.
- Commit that the U.S. Environmental Protection Agency (EPA) shall consider treaty resource values of aquatic ecosystems, wetland vegetation, fisheries, and wildlife in determining whether water resources that would be affected by the Talon Metals / Rio Tinto mine are “aquatic resources of national importance.”
- Allocate one-fourth of the amount of the Talon Metals / Rio Tinto mine subsidy to the U.S. Geological Survey—in collaboration with tribes and the EPA—to perform the hydrology studies necessary to evaluate impacts of mine dewatering, alteration of wetlands, transport of contaminants, and other effects of potential mining of the Tamarack Intrusive Complex.

The decisions we make at this important time in history as we face the climate crisis will define whether or not future generations are able to thrive. Sound decisions must be based on scientific evidence, robust environmental review, and free prior and informed consent of Native and other local and downstream communities.

Sincerely yours,

Honor the Earth

WaterLegacy

Earthworks

Minnesota Organizations

AFGE Local 704

Emily Mine Information Group

Friends of the Boundary Waters

League of Women Voters Minnesota

Minnesota Environmental Partnership

Minnesota Interfaith Power and Light

North American Water Office

Northeastern Minnesotans for Wilderness

Save Lake Superior Association

Save Our Sky Blue Waters

Sierra Club North Star Chapter

Tamarack Water Alliance

Twin Ports DSA

Vote Climate

Waadookawaad Amikwag

Zumbro Valley Audubon Society

National Organizations

1000 Grandmothers for Future Generations

198 methods

350 Triangle

350.org

350Hawaii

350PDX

Animals Are Sentient Beings, Inc.

Between the Waters

Center for Biological Diversity

Climate Organizing Hub

Coalition to Save the Menominee River

Contra Costa Move On

Detroiters Working for Environmental Justice

Don't Waste Arizona

Earth Action, Inc.

Extinction Rebellion San Francisco Bay Area

Frack Action

Fridays for Future US

Great Basin Resource Watch

Heartwood

Humboldt Unitarian Universalist Fellowship Climate Action Campaign

Idle No More SF Bay

Indigenous Environmental Network

NGO Letter on Premature Subsidy of Talon Metals Mine

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Institute for Policy Studies Climate Policy Program
Intheshadowofthewolf
London Mining Network
Malach Consulting
McCabe Chapter Izaak Walton League of America
Micronesia Climate Change Alliance
MiningWatch Canada
Movement Rights
New Mexico Climate Justice
North American Climate, Conservation and Environment(NACCE)
OHALAH: The Association of Rabbis and Cantors for Jewish Renewal
Oil and Gas Action Network
Our Revolution Hawaii
Pennsylvania Interfaith Power & Light
Presente.org
Primavera Zur
Protect the Eau Claire River
Public Citizen
Pueblo Action Alliance
Resist the Pipeline
Resource Renewal Institute
Rise Up WV
Sierra Club
SIRGE Coalition
Sisters of Mercy of the Americas Justice Team
Stand.earth
Strong Economy For All Coalition
Sunflower Alliance
Terra Advocati
The People's Justice Council
The Quantum Institute
TIAADivest
Turtle Island Restoration Network
Unitarian Universalists for Social Justice
Unite North Metro Denver
WI Mining Impact
Wisconsin Resources Protection Council
Women's Earth and Climate Action Network