

**From:** Barss, Peter

**Sent:** Thursday, June 21, 2012 11:23 AM

**To:** Parsonage, Roger; Ferguson, Dan; \_\_\_IH Medical Health Officers; Kendall, Perry HLTH:EX; Emerson, Brian P HLTH:EX; Adams, Evan HLTH:EX; Young, Eric R HLTH:EX

**Subject:** FW: KGHM AJAX open pit mine proposal for Kamloops - letters and documents regarding a health hazard from a citizen, a ministry, and an MHO

**Importance:** High

Dear Colleagues,

Since the Kamloops open pit mine Medical Health Officer project review was passed on to me on 1<sup>st</sup> May 2012, I have given serious consideration to the health issues and potential hazards of the proposal. Prior to that, I had little knowledge about the project. I declare that I have no personal biases with respect to this project or the companies and consultants involved, and do not own or intend to own property in Kamloops.

The first major project-related event I attended was in early May 2012, a review meeting on air and noise issues with the proponent's consultants, the Environmental Assessment Office's two project staff, and other government and community representatives. My concern had already been raised by project documents provided and read prior to the meeting, and subsequently by presentations and responses to questions from the proponent's consultants and the EAO. The meeting lasted five hours rather than 2.5 as initially planned, due to the many questions raised by participants.

As a result, over the past six weeks, I have consulted with the BCCDC, senior staff at the Ministry of Health, and the office of the PHO, as well as US and other Canadian colleagues. They were all then briefed on the project, and subsequently provided helpful feedback. To further increase my understanding, I have read extensively and attended a health impact assessment workshop sponsored by the Canadian Collaborating Centre for Environmental Health.

A high level, generally positive, review of the situation between public health and the EAO was conducted. The Provincial Health Officer's representative was Dr Brian Emerson, who drafted the 2012 revision of the BC Public Health Act, and the MHO was represented by Dr Tim Lambert, Executive Director of Health Protection for BC. Dan Ferguson and I represented IHA, and Dr Catherine Elliott the BCCDC Environmental Health Section. The EAO project director and his supervisor clarified that they do not have health or health impact assessment expertise among the EAO's 50 staff.

They showed sensitivity to the need for independent expertise for health concerns raised by Interior Health. It was clarified that the Minister of Health does not have the authority to declare a project a hazard when it is supported by the EAO Project Director, Ministry of Mines, and Ministry of the Environment. On the other hand, when the project is within a specific health authority, Health Officers from that Health Authority do under Article 31 of the BC Public Health Act.

More recently I have completed a detailed review of the proponent's air and noise consultants project proposals. Available project details, few and not very comprehensive, were also reviewed for water and mine tailings. These documents augmented rather than lowered my concerns. Copies of my two responses, one on general issues and the other on specific air and noise issues are attached for your review, along with this letter. I have received detailed and most helpful technical feedback from Dr

Catherine Elliott of BCCDC Environmental Health Section, much of which is incorporated in the air and noise reviews, as well as feedback from our two project EHOs Misty Palm and Brent Zaharia. However, while every suggestion was gratefully received and considered carefully, not all were incorporated, and I remain accountable for the contents.

As a result of my concerns about the proposal's implications for the 100,000 people in and around Kamloops and countless more en route to the coast, plus the lack of clear solutions for a project of this nature, unprecedented for our country and therefore unpredictable in many health aspects, I have woken most nights since May concerned about the public health impact of the proposed mine.

There has been considerable public fear about the mine among the people of Kamloops. Yesterday, I received the emails and letters below and attached from staff for the office of the BC Minister of Health, in response to a detailed letter to the Honourable Michael de Jong from a knowledgeable, concerned citizen. I suggested that the Ministry should share the citizen's letter with the Ministry of Mines, Ministry of the Environment, and the EAO.

After considerable further reflection on all of the above, I am of the professional opinion that the proposed open pit mine poses an unprecedented health hazard for the peoples of Kamloops. This may also be the case to a lesser extent for peoples on and along watersheds on to the Fraser River, and transportation corridors for IHA and other Health Authorities from Kamloops to the port of Vancouver; however, such more widespread effects would require further investigation and documentation. I do not believe that further discussions with the EAO and the proponent's staff in upcoming proposed meetings will change the hazard assessment for Kamloops. Further such discussion will expend considerable public funds with the opportunity costs of distraction to other public health duties. It could also waste the proponent's funds.

Hence, in my professional opinion the proposed Ajax Kamloops open pit mine is ill conceived and poorly situated, and therefore unsafe, and would represent, if enacted, a serious public health hazard for the city and peoples of Kamloops. The project should therefore be declared as such as soon as possible. As I understand, under Article 31 of the BC Public Health Act, the Ministry of Mines, Ministry of the Environment, and the EAO should therefore be ordered to stop the review process for the proposal and remove it from further consideration.

I submit this for your review and recommendations as the need for such an order is uncommon. Your feedback and advice would be greatly appreciated.

Thank you in advance,

Peter

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