



Regions & Programs Bureau  
Environmental Health Program  
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March 03, 2016

Kevin Inouye  
Project Manager  
Canadian Environmental Assessment Agency  
410-701 Georgia Street West  
Vancouver, BC  
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Sent by email to: kevin.inouye@ceaa-acee.gc.ca

**Subject: Health Canada's Comments on the Environmental Impact Statement to the Canadian Environmental Assessment Agency (CEAA) for the Ajax Mine Project**

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Dear Mr. Inouye:

This letter is in response to CEAA's email, dated January 19, 2016, requesting Health Canada's review of the Environmental Impact Statement (EIS) for KGHM Ajax Mining Inc.'s (the Proponent's) Ajax Mine Project (the Project). Health Canada has reviewed the Project's Environmental Impact Statement (EIS) dated December 01, 2015 in its capacity as a Federal Authority, as defined by subsection 12(3) of the former *Canadian Environmental Assessment Act* (1992) in order to document outstanding concerns/comments, as well as any additional deficiencies that the Department has identified to date.

Our comments seek additional information, rationale, or clarification from the Proponent to ensure the EIS presents a reasonable and defensible assessment of the environmental effects that the Project may have on human health from changes to the bio-physical environment. Upon request from CEAA, Health Canada can provide additional comments on any proposed mitigation methods for the Project.

In keeping with our mandate, Health Canada has primarily focused its review on the following subject areas: Human Health Risk Assessment (HHRA), Country Foods, Air Quality, Drinking Water Quality and Noise. The Department's outstanding concerns/comments are identified in the attached table: "Ajax\_2016.03.03\_HC comments tracking table.xls".



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Health Canada's approach generally looks at the Proponent's selection of contaminants of potential concern, how they are dispersed off-site, and the potential consequential effects on human health through consumption, respiration and physical contact. Health Canada has noted several concerns with the assumptions used in determining the parameters carried into, among others, air and country foods modelling, to support the human health risk assessment. While we are providing comments for the Agency's consideration on the present results of the HHRA, a comprehensive evaluation can only be completed once the requested additional information has been provided by the Proponent, and modelling assumptions are fully explained and updated.

Thank you for providing Health Canada with the opportunity to comment on the EIS for the Ajax Mine Project. If CEAA has any questions regarding Health Canada's response or additional specific human health concerns with respect to this Project on which you would like to learn Health Canada's views, we would be pleased to make available the specialist or expert information or knowledge within our possession.

Sincerely,

Lucille Lukey, Regional Environmental Assessment Coordinator  
Health Canada, British Columbia Region  
Phone: (604) 666-5720

cc: Herbert Antill, A/EHP Regional Manager  
Laurence Davidson, A/EA Program Manager, National Capital Region, Health Canada  
Gregory Kaminski, Senior Environmental Health Specialist, Health Canada  
Katherine Hess, A/Environmental Assessment Coordinator, Health Canada

[Enclosures]