



Environmental Protection Operations
Environmental Stewardship Branch
Pacific and Yukon
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August 11, 2016

CEAR: 62225
ECPT: 11-0201

Kevin Inouye, Project Manager
Canadian Environmental Assessment Agency
410-701 Georgia Street
Vancouver, BC V7Y 1C6

Re: Environment and Climate Change Canada Supplemental Comments about GHG related to the EIS for the Proposed Ajax Copper-Gold Project

Environment and Climate Change Canada (ECCC) previously reviewed the following document provided by the Canadian Environmental Assessment Agency (Agency) and the British Columbia Environmental Assessment Office (BCEAO) on January 20th, 2016.

- *KGHM – Ajax Project Environmental Assessment Certificate Application / Environmental Impact Statement for a Comprehensive Study - Volumes 1 – 21.*

On March 29, 2016, ECCC formally submitted comments resulting from a technical review of the EIS and indicated that additional comments may be forthcoming pertaining to species at risk and greenhouse gases. On April 25, 2016, ECCC submitted additional supplemental comments about species at risk.

At this time, ECCC is providing additional supplemental comments in relation to greenhouse gases.

In addition to the material attached, ECCC has the following general recommendations related to the management of direct greenhouse gas (GHGs) emissions that may result from the project.

- The proponent should develop and implement site-specific plans to minimize GHG emissions. In developing these plans, consideration should be given to recommendation R 415, "Measures to Control GHG Emissions", of ECCC's Environmental Code of Practice for Metal Mines (2009). Plans should describe:
 - Potential sources of GHGs;
 - Factors that may influence the release of GHGs;
 - Measures to minimize releases of GHGs;
 - Monitoring and reporting programs for releases of GHGs;
 - Mechanisms to incorporate the results of monitoring programs into further improvements to measures to minimize releases; and,
 - Mechanisms to periodically update the plans.

- The Proponent should consider the CCME's *Environmental Code of Practice for On-Road Heavy-Duty Vehicle Emission Inspection and Maintenance Programs (2003)*.

If you have any questions, please contact Stephen Sheehan at 604-666-0901. In his absence, you may also contact Bob More at 604-666-8329 or Marc Lapointe at 1-867-667-3403.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'al hodaly', with a stylized flourish at the end.

Al Henry Hodaly
A/Head, Environmental Assessment (PYR)
Environmental Stewardship Branch
Environment and Climate Change Canada

Attach. (1)

cc: Krysia Zurakowski, BCEAO