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Ms Janice Traynor  
Environmental Scientist  
Environment and Conservation Division  
Indian and Northern Affairs Canada - Nunavut Region  
P.O. Box 2200  
Iqaluit, NU  
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Dear Ms Traynor,

**Re: Doris North Project**

At your request, scientists from Health Canada have reviewed the Draft Environmental Impact Statement (EIS) for the Doris North Project (January 2003) that was submitted by Miramar Hope Bay Ltd. The focus of these comments consider whether or not the Proponent has addressed the Environmental Assessment Guidelines in a satisfactory and sufficient manner, rather than at the accuracy and validity of the contents of the EIS. The Department only received the EIS on March 12, 2003, from the proponent, and while our goal is to respect the Nunavut Impact Review Board's timelines, our comments may not be as thorough as we had hoped because of a shortened review period of less than a week.

As mentioned in our previous correspondence, the responsibility for First Nation's health and well-being was transferred to the Government of the Northwest Territories in 1988 (when Nunavut was still part of the NWT), and so we trust that the appropriate territorial health authorities are involved in the process. However, Health Canada has an interest about the health and well-being of all Canadians and as such, our areas of concern have centred on the potential impact of the proposed project on aboriginal community health, food systems, and public consultation.

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**CONFORMITY CONCLUSIONS:****1. Aboriginal community health:**

Aboriginal community health is captured within the socio-economic component of the EIS (Appendix L and summarized in s. 4, 5, 7.4 of the EIS). In general, the baseline description provided concerning the socio-economic state of all communities is excellent. The statistics give crucial information, and the text paints a vivid picture of the communities. These appear to be communities with important social, cultural and health concerns. These populations are likely to be susceptible to change, especially any changes that could affect the social fabric of Kitikmeot communities.

The potential socio-economic impact assessment to include the project, however, is deficient. This assessment focuses on community growth as an indicator of the impacts of the project, yet, given the fact that the mine is a fly-in/fly-out operation, community growth is highly unlikely. Therefore, better indicators of social and health impacts would be more suitable. Outstanding issues (ie. potential impacts to country foods (such as wildlife), impact of mine closure, etc.) that need to be addressed involve section 4.21.4 of the EIS Guidelines which states:

► **Section 4.21.4 "Social, Economic and Cultural Components"**

*"The proponent shall assess the potential impacts on socio-economic and cultural components, taking into account the following: the health of the workers, their families, and other residents (human health includes physical, psychological, emotional, spiritual and mental health),....the social life of the concerned communities, etc...."*

To improve the section of the potential impacts of the project on the socio-economic environment, drawing upon the experience of public health professionals in the Kitikmeot region might be helpful. As well, additional guidance is available in the Canadian Handbook on Health Impact Assessment which can be found at: <http://www.hc-sc.gc.ca/ehp/ehd/oeha/hia/index.htm> (note especially Volume 1 (Chapter 5), Volume 2 (section on gold mining), and Volume 3 (Chapters C and F)).

Finally, the socio-economic monitoring for this project is crucial given the short mine life. The monitoring needs to match the thorough baseline data, particularly the indicators of health and wellness (ie. mine closure will mean the halt of cash flow and employment - will this impact on crime/violence rates, mental health, etc?). The monitoring programme as described in the EIS does not conform to Guideline 4.26 which states:

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► **Section 4.26 "Monitoring and Follow-Up"**

*"The Proponent shall present a Monitoring and Follow-Up Plan that includes compliance, biophysical and socio-economic monitoring programmes, and a follow-up programme to integrate the monitoring results into a coherent programme of action and to evaluate the effectiveness of mitigation measures during operation and after the final closure of the Project...etc".*

In order to meet this guideline, the following is needed: a description of the reporting of monitoring findings, details of monitoring the post closure period, and a statement of who will pay to finance the monitoring programmes.

**2. Food Systems:**

► **Section 4.21.2.5 "Wildlife" and 4.21.2.7 "Aquatic Organisms & Habitats"**

*"The analysis of potential impacts on wildlife/aquatic organisms shall include...bioaccumulation and biomagnification of toxins"*

The EIS does not conform to these Guidelines. On p. 5-60 (s. 5.3.9) "Terrestrial Wildlife and Habitat" (of the EIS), the proponent reasons that bioaccumulation and biomagnification of toxins are not expected to affect wildlife since contaminant sources, exposure pathways and potential exposure times would be limited. (Source control would be managed through the proper handling and storage of potential contamination sources.) It further goes on to mention that "while not an ideal source of drinking water, water quality in Tail Lake is not likely to result in significant adverse health impacts to caribou." Furthermore, there is no baseline data on contaminant level in tissue of wildlife that frequents the project area. While the proponent may not deem an assessment of contaminants in wildlife consumed to be justified, the perceived public perception of contaminants in wildlife should be considered and therefore, the Guidelines in this area should be adhered to.

An explanation of the efforts taken to keep wildlife and migrant hunters away from the ore stockpile, the tailings outflow pipe, the tailings impoundment, and Tails Lake should be given, particularly after the mine closes. Will there be any precautions (ie. warnings, advisories, barricades, etc.), or other measures taken to restrict movement into or the use of the water of these areas?

**3. Public Consultation:**

► **EA Guidelines, Section 4.5 "Public Consultation"**

*"The Proponent shall describe the communications programme that will be*

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*implemented if the Project is approved, with particular reference to initiatives to communicate changes to information, plans, or strategies. It shall also discuss how the public, particularly the residents of the Kitikmeot Region, could contribute to project implementation, including the design of management and monitoring strategies."*

The EIS is deficient in this area. An ongoing consultation plan developed with the First Nations that works throughout the life cycle of the project, particularly past the completion of the EIS, should be provided. Previous consultation sessions since early 2000 were briefly mentioned but no real substance on what came out of these sessions has been provided. As well, more concise and detailed information is needed regarding future initiatives, including community involvement in the monitoring strategies.

**General Comments:**

- The Cumulative Effects Assessment portion of the EA is weak. The analysis is based primarily on assumptions rather than solid information or data that the impacts will be minor, if any, therefore won't contribute to cumulative effects. Moreover, the Cumulative Effects component is based on the assumption that this project is out of the area of influence of other projects.
- The Environmental Assessment Guidelines (October 15, 2002) should be included as an appendix to the EIS.
- All of the maps should have a legend and a north arrow. For the map of the Inuit owned land, the project location should be identified. The map of the communities in Appendix L needs improvement - specifically, the inset box is very confusing. Landmarks are needed in this inset, and a different colour background in the inset would also improve map interpretation.

Should you have any questions or require any additional information, please contact me at (613) 952-8712, by fax at (613) 941-8921 or via e-mail at [maria\\_ooi@hc-sc.gc.ca](mailto:maria_ooi@hc-sc.gc.ca)

Sincerely

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