

## ADVICE TO MINISTER

### CONFIDENTIAL ISSUES NOTE

Ministry: Energy and Mines

Date: June 2013

Minister Responsible: Hon. Bill Bennett

## Ajax Mine - Kamloops

### SUGGESTED RESPONSES:

- **The Project is in the pre-application stage of a comprehensive federal/provincial environmental assessment process.**
- **In early 2012, the federal and provincial government hosted public information sessions to explain the purpose and content of Ajax's Environmental Impact Statement (EIS) documents.**
- **The sessions were to seek input from the public on whether the information contained in the application would satisfy their interests and concerns.**
- **Staff members from both levels of government as well as KGHM Ajax Mining Inc. were on hand to answer questions regarding the proposed Project's environmental assessment process.**
- **If the project is approved, it will generate 580 construction jobs, 380 full-time jobs during operations, plus tax revenue, royalties and benefits for governments, local communities and First Nations, including the Tk'emlúps and Skeetchestn Indian Bands.**

### BACKGROUND:

The Ajax project is a proposed, open-pit copper-gold mine located near and partly within the city limits of Kamloops, British Columbia, in an area of past production. Current infrastructure includes mill buildings, shop facilities, tailings area, haul road, water rights and related permits.

The 2011 feasibility study, noted the Ajax mine is projected to produce 109 million pounds of copper and 99,000 ounces of gold annually over its 23-year mine life.

If the project is approved, it would generate 580 construction jobs, 380 full-time jobs during operations, plus tax revenue, royalties and benefits for governments, local communities and First Nations, including the Tk'emlúps and Skeetchestn Indian Bands.

Community concerns brought forward on the project relate to dust, blasting vibration, aesthetics, potential economic and environmental impacts on housing, ground water hydrology, and potential environmental impacts to Jacko Lake, among others.

## ADVICE TO MINISTER

Communications Contact:	Michelle Hynes	250 952-0650
Program Area Contact:		
File Created:	2013	
File Updated:		
File Location:	\\emcom.shr\ISSUES\ISSUES NOTES\	

Minister's Office	Program Area A/ADM	Deputy	Comm. Dir

**CONFIDENTIAL  
ISSUES NOTE**

Environmental Assessment Office

Updated: June 27, 2013

Minister Responsible: Mary Polak

## Ajax Mine Project

**ADVICE AND RECOMMENDED RESPONSE:**

- The proposed project is in the pre-application stage of the environmental assessment process.
- It is subject to a coordinated federal-provincial environmental assessment.
- The public consultation for the environmental assessment process reflects the high level of public interest in the project.
- KGHM has publicly stated their intention to submit their application for Ajax in the fall of 2013.

**If asked about transparency:**

- British Columbia's environmental assessment process is built on the principle of transparency.
- The Environmental Assessment Office also has a responsibility under its regulations to provide public access to a wide range of records that form part of every environmental assessment.
- Every document we receive that is relevant to the environmental assessment of a proposed project is posted on the Environmental Assessment Office website, where they are all available for anyone to access.
- That is just as true for the proposed Ajax mine as it is for any other project.
- Transparency is also built into the way the process works. For example, for Ajax:
  - The Public Comment Period during the pre-application stage ran for 75 days.
  - A Community Advisory Group has been formed by the Environmental Assessment Office.

- The Environmental Assessment Office ordered KGHM Ajax Mining to prepare a Public Consultation Plan.
- Once the application is deemed complete, it will be the subject of a full environmental assessment review.

#### **KEY FACTS REGARDING THE ISSUE:**

Key issues include:

- water and air quality (e.g. dust);
- noise and vibration;
- socio-economic impacts;
- impacts to vegetation, wildlife and wildlife habitat, including impacts to fish and fish habitat;
- proximity to residential areas;
- impacts on tourism, agriculture and ranching activities; impacts to the local and regional economies; and
- impacts on First Nations' rights and interests.

#### **Background:**

KGHM Ajax Mining Inc. (Proponent) proposes to develop a \$535 million open pit gold and copper mining project at the southwest edge of Kamloops.

The proposed Project requires an environmental assessment (EA) certificate under the *Reviewable Projects Regulation* because it is a new mine facility that, during operations, will have a production capacity of greater than 75,000 tonnes per year of mineral ore.

<b>Stage in EA process: Pre-application</b>	
<b>Milestone</b>	<b>Background/Status</b>
February 8, 2011: The Proponent submitted a project description.	
February 25, 2011: The proposed Project entered the EA process.	
June 8 until July 11, 2011: A 33-day public comment period on the project description and the proposed Project.	
June 16, 2011: Open house held in Kamloops.	Approximately 350 people attended. EAO conducted the first public comment period and open house earlier than usual in the EA process to better coordinate with the federal review process, and to consider public input when determining the scope of the EA.
August 2011: The Proponent submitted the first draft of the Application Information Requirements (AIR)/Environmental Impact Assessment (EIS) Guidelines.	AIR/EIS Guidelines document provided to the technical Working Group and First Nations for input/comments.
January 11, 2012: Revised section 11 Order issued.	Included a requirement for a Public Consultation Plan and First Nations Consultation Plan to be developed to EAO's satisfaction.

January 11, 2012: Key stakeholders in the region were invited to participate on a Community Advisory Group.	Forum was designed for discussion and input related to the EA of the proposed Project.
January 2012: The second iteration of the draft AIR/EIS Guidelines was developed and posted to EAO's website for public comment.	This second version included input provided by First Nations and the Working Group.
January 11, 2012 - March 27, 2012: 75 day public comment period on the draft AIR/EIS Guidelines.	The comment period was extended from 60 to 75 days on March 7, 2012.
February 6 & 7, 2012: Public information sessions (with CEA Agency) held in Kamloops.	Approximately 1,100 people attended. The sessions offered one-on-one discussions between members of the public, the Proponent's technical experts, and provincial and federal agency staff.
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May 4, 2012: The Community Advisory Group was invited to review public comments on the draft Application Information Requirements.	
June 19, 2012: EAO issued a Request for Proposals for socio-economic work related to the proposed Project.	The successful bidder is required to review the socio-economic work of the Proponent of the proposed Project at three stages of the environmental assessment process (pre-Application, Application Screening, and Application Review) and provide professional guidance and advice to EAO.
June 25, 2012: The Proponent submitted the issues tracking tables on the draft Application Information Requirements (dAIR) document that incorporates input from the Public Comment Period and Working Group.	EAO will work with the Working Group, Community Advisory Group, and outside expertise to determine if the Proponent adequately responded to the input received.
July 23, 2012: EAO hired Socio-Economic contractor to provide advice to EAO.	Pierce – Lefebvre Consulting will provide advice to EAO on socio-economic aspects of dAIR Review, Application Screening and Application Review. The contract is in effect until March 31, 2014 (subject to available funds).

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October 2012: Proponent public workshops	The Proponent hosted workshops with key interest groups and individuals to understand the potential social and economic effects of the proposed Project.
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January 17, 2013: EAO Presented at Public Forum

EAO representatives presented on the provincial EA process at a public forum organized by the Thompson Rivers University. Approx. 150 attendees.

June 3, 2013: Application Information Requirements (AIR) finalized by EAO	This document sets out the information to be collected and studies to be undertaken by the Proponent in support of their Application for an Environmental Assessment Certificate.
Date TBD	Following the completion of the AIR, and prior to submission of an application, the proponent will host a series of public workshops to discuss the results of key studies that will be part of the EA application.
Date TBD: Submission of Application by Proponent	Proponent has stated publicly they intend to submit their Application to EAO by the end of September 2013.

Communications Contact:  
Program Area Contact:

Greg Leake  
Scott Bailey

387-2470  
356-1124

## **Issue Summary Note Advice to the Minister**

**Date:** June 3, 2013

**Project:** Ajax Mine Project (proposed Project)

### **Recommended Response:**

- The proposed Project is in the pre-application stage of the environmental assessment process.
- The proposed Project is subject to a coordinated federal-provincial environmental assessment.
- The public consultation process recognizes and reflects the high level of public interest in the proposed Project.
  - The Public Comment Period for the draft Application Information Requirements document was extended from 60 to 75 days.
  - A Community Advisory Group has been formed by the Environmental Assessment Office to work directly with interest groups for input and dialogue.
  - The Environmental Assessment Office ordered KGHM Ajax Mining Inc. to prepare a Public Consultation Plan, which included a series of public issue-specific workshops in the spring and summer of 2012, and additional workshops will be delivered prior to the submission of the Application.

## Key Issues:

The proposed Project is a 60,000 tonne per day open-pit copper-gold mine partially within the City limits of Kamloops. Key issues include:

- water and air quality (e.g. dust);
- noise and vibration;
- socio-economic impacts;
- impacts to vegetation, wildlife and wildlife habitat, including impacts to fish and fish habitat;
- proximity to residential areas;
- impacts on tourism, agriculture and ranching activities; impacts to the local and regional economies; and
- impacts on First Nations rights and interests.

## Other relevant information

KGHM Ajax Mining Inc. (Proponent) proposes to develop a \$535 million open pit gold and copper mining project at the southwest edge of Kamloops, BC.

The proposed Project requires an EA certificate under the Reviewable Projects Regulation because it is a new mine facility that, during operations, will have a production capacity of greater than 75,000 tonnes per year of mineral ore.

Stage in EA process: Pre-application	
Milestone	Background/Status
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August 2011: The Proponent submitted the first	AIR/EIS Guidelines document provided to the



draft of the Application Information Requirements (AIR)/Environmental Impact Assessment (EIS) Guidelines.	technical Working Group and First Nations for input/comments.
January 11, 2012: Revised section 11 Order issued.	Included a requirement for a Public Consultation Plan and First Nations Consultation Plan to be developed to EAO's satisfaction.
January 11, 2012: Key stakeholders in the region were invited to participate on a Community Advisory Group.	Forum was designed for discussion and input related to the EA of the proposed Project.
January 2012: The second iteration of the draft AIR/EIS Guidelines was developed and posted to EAO's website for public comment.	This second version included input provided by First Nations and the Working Group.
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EAO representatives presented on the provincial EA process at a public forum organized by the Thompson Rivers University. Approx.150 attendees.

June 4, 2013: AIR

Final Application Information Requirements were issued.

Date TBD

Following the completion of the AIR, and prior to submission of an application, the proponent will host a series of public workshops to discuss the results of key studies that will be part of the EA application.

## Project Details

- KGHM Ajax Mining Inc. (Proponent) proposes to develop a \$535 million open pit gold and copper mining project at the southwest edge of Kamloops, BC.
- The proposed Project requires an EA certificate under the *Reviewable Projects Regulation* because it is a new mine facility that, during operations, will have a production capacity of greater than 75,000 tonnes per year of mineral ore.
- Key issues include:
  - Water and air quality (e.g. dust);
  - noise and vibration;
  - socio-economic impacts;

- impacts to vegetation, wildlife and wildlife habitat, including impacts to fish and fish habitat;
- proximity to residential areas;
- impacts on tourism, agriculture and ranching activities; impacts to the local and regional economies; and
- Impacts on First Nations rights and interests.

## **Federal Review**

- The EA is being conducted as a coordinated federal/provincial comprehensive study.
- Fisheries and Oceans Canada has confirmed that the proposed Project will require a federal review and will likely include Natural Resources Canada, Health Canada, Transport Canada and Environment Canada.

## **First Nations and Other Governments**

- The proposed Project is located within Secwepemc territory. The Kamloops and Skeetchestn Indian Bands are located in closest proximity to the proposed Project and are both participating in the EA. The Proponent is required to consult with these two Bands.
- Ashcroft Indian Band and Lower Nicola Indian Band are also participating in the EA as members of the Working Group. EAO is required to consult with these two bands s 16

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- The City of Kamloops and the Thompson-Nicola Regional District have accepted EAO's invitation to participate in the EA.
- First Nations consultation is being led by EAO, in coordination with the Ministry of Aboriginal Relations and Reconciliation and the Ministry of Forests, Lands and Natural Resource Operations.

### **Contact:**

Scott Bailey  
Executive Project Director  
250-356-1124

### **Alternate Contact:**

Lindsay McDonough  
Project Assessment Officer  
250-387-7411



## IH Communications Briefing Note

June 6, 2013 CONFIDENTIAL

### Topic

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FOIPPA – Interior Health MHO communications related to Ajax Mine proposal

### Background

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- An individual, acting on behalf of a Kamloops Physicians for a Healthy Environment advocacy group, has requested through the Freedom of Information and Protection of Privacy Act:
  - *The notes and research of Dr. Peter Barss and Dr. Andrew Larder regarding the Ajax Mine Project and communications between these two physicians.*
- During the week of June 10-14, IH will provide a series of emails between the two physicians, both Medical Health Officers with Interior Health, written between May 28, 2012, and April 5, 2013.
- The emails relate to IH-Health Protection's review of the Ajax Mine proposal as part of the provincial working group for the Environmental Assessment Office review process. The EAO process is currently in the pre-application stage, with the proponent gathering the specific information required for proper evaluation upon the mine's submission of application (the draft application requirements were finalized on June 4<sup>th</sup>; the proponent is expected to submit formal application in fall 2013). IH's part in the process has been evaluation of the project from an environmental health hazard perspective. (*See related briefing note from April 30, 2013, for background on EAO process*)
- The Kamloops Physicians for a Healthy Environment, which includes members of the RIH medical staff, has raised concerns about the health impacts of the proposed mine. In past months, the group has requested that IH conduct an independent health impact assessment for Ajax.
- A health impact assessment has been incorporated into the EAO process, and IH is working within that process.
- However, there are recurring themes within the emails from Dr. Barss that are critical of the EAO and its processes (and by extension, the Ministry of Environment). For example:
  - there is suggestion that the EAO has an "agenda" and is trying to push the application along, and is not providing IH enough time to properly review and respond to the proponent's proposal;
  - information from the proponent and its consultants is not forthcoming and recommendations by IH are not being addressed, and as a result a proper health impact assessment cannot be completed within the EAO process.
- There is risk that these themes may be used to question the EAO's credibility and would call the EAO process into question.
- In addition, some comments may reflect an opinion that IH does not have the resources or expertise to properly evaluate the mine application, and that the mine, if approved, would present a health hazard to Kamloops residents. They may also be misunderstood to suggest that IH opposes the mine project.

- The comments reflect the personal opinion of the IH MHO and go beyond the scope of IH's responsibilities and involvement with respect to the EAO process.
- *Note:* While Dr. Barss provided MHO support to the IH-Health Protection team evaluating the Ajax proposal for a time, there has been an internal HP team reorganization that has subsequently resulted in a change in some of those team members; Dr. Larder, who is the Senior MHO, is now providing MHO support.

## Key Messages

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- We appreciate there is a level of public concern regarding the potential health impacts of the Ajax Mine project. The mine has inspired much conversation since the Environmental Assessment Process began two years ago, and many opinions have already been formed about whether it should or should not go forward in Kamloops.
- The comments made by our Medical Health Officer reflect his opinion about the mine proposal. He is entitled to form his own opinions, but it's important to know that those opinions do not reflect the point of view of Interior Health – because it is too early in the Environmental Assessment process to have formed a conclusion about this project.
- The role of Interior Health's Health Protection team in the Environmental Assessment process is to ensure that environmental health hazards related to the project are identified and properly assessed. The EA process is currently in the pre-application stage. As one of many stakeholders on a provincial working group, Interior Health-Health Protection has been reviewing submissions by the proponent to ensure that it is including all the information that would be required in its application to properly evaluate the mine project proposal from an environmental health hazard perspective.
- IH's role in the EAO process is to provide unbiased input regarding management of potential environmental health hazards. We are committed to working within that process and will continue to do so.

*Is Dr. Barss still working on the IH Health Protection Team evaluating the mine proposal?*

- While Dr. Barss provided physician support to the IH-Health Protection team evaluating the Ajax proposal for a time, there has been an internal Health Protection reorganization that has subsequently resulted in a change in some of those team members. Dr. Larder, who is Interior Health's Senior Medical Health Officer, is now providing physician support to the EA process on Ajax.

*What about the reference in the documents that the EAO is trying to push through the Ajax Mine proposal without giving proper time for review and evaluation of the application to ensure a health impact assessment can be completed?*

- I cannot speak for the EAO, but I can tell you that Interior Health is committed to working within the EA process.
- Our role is to review submissions by the proponent to ensure that it is including all the information that would be required in its application to properly evaluate the mine project proposal from an environmental health hazard perspective.

*Does IH even have the adequate resources to review and evaluate the Ajax proposal?*

- Interior Health has the capacity and resources to review the Ajax application from a health hazard perspective – as we have been doing all along.
  - When we've been asked to review and provide feedback on information that has been beyond the mandate of a regional health authority, we have recommended that the EAO engage a qualified third-party consultant – for example, the creation of better industry practices for the construction, operation and decommissioning of major mining projects.
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**PREPARED FOR:**  
**PREPARED BY:**  
**SPOKESPERSON:**

**Manager, Public Affairs & VP Public Affairs**  
**Tracy Watson, Communications Officer, IH West**

## ADVICE TO MINISTER

<b>CONFIDENTIAL ISSUES NOTE</b>  <b>Ministry: Health</b> <b>Date: June 26, 2013</b> <b>Minister Responsible: Terry Lake</b>	<b>Ajax Mine -- FOI</b>
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### ADVICE AND RECOMMENDED RESPONSE:

- We take the health and safety of British Columbians very seriously, and are committed to balancing the benefits of resource development projects with ensuring environmental and public health and safety.
- That is why BCCDC and Interior Health have been involved in the Environmental Assessment process for Ajax since 2011.
- The main point to be taken from these letters is that our public health experts all agree – an important part of the Environmental Assessment process for the Ajax mine is a detailed health impact assessment for this project by the proponent, to ensure that the concerns around public health are understood and addressed.
- This proposal is unique in its proximity within Kamloops, so an assessment is really the only way we will be able to gather the information needed.
- For further details on the application process and recommendations from Interior Health, I recommend you speak with IH.

### BACKGROUND REGARDING THE ISSUE:

- On Wed. June 26, the Kamloops Area Preservation Association issued a statement that they would be releasing a letter obtained via FOI from BCCDC to Interior Health outlining potential concerns with the Ajax Mine proposal.
- This will be released at 7:30 pm, June 26<sup>th</sup>.
- Interior Health believes that the letter is a heavily redacted letter from BCCDC outlining their review of documents about any potential health impact of the proposed mine (SEE APPENDIX FOR A COPY OF THIS LETTER). This is based on comments in media that the letter cannot be commented on until it is released in its entirety, and that it is significant in what it hides – not what it says.
- Should that be the letter in question, questions could be raised about why so much of the letter was redacted under FOI.
- Portions of the document were redacted under FOI section 13 (policy advice) at the recommendation of PHSA/BCCDC.
- The general content of the letter (and others) is that health experts – those at BCCDC, IH and PHO – agree that a detailed health impact assessment should be undertaken by the proponent prior to the approval of this project.
- Given the uniqueness of the proposal – its proximity to a relatively large city and all that that entails – there are a number of public health aspects that we need information on before they-public health would be comfortable saying that the project should go forward.

## DISCUSSION/ADVICE:

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Communications Contact: Laura Neufeld  
Program Area Contact: Tim Lambert, Perry Kendall, Interior Health,  
BCCDC  
File Created: June 26, 2013  
File Updated:  
File Location: Document3

Minister's Office	Program Area	Deputy	Media Manager
			Ryan Jabs

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[www.bccdc.ca](http://www.bccdc.ca)  
Tel 604.707.2443 | Fax 604.707.2441

25 May 2012

Dear Peter,

Thank you for sharing the reports regarding the Ajax Mine Project:

1. Detailed Noise Modelling Plan
2. Detailed Dispersion Modelling Plan

We have reviewed these documents briefly in the short turnaround time and present our initial comments here. A thorough review of these documents should involve experts in the environmental impact assessment and human health risk assessment of noise and air pollution.

The approach taken in these reports includes standard environmental impact assessment (EIA) methodology. There are a number of considerations that could be addressed to more thoroughly assess the potential impacts to air and noise and their effects on human health

It is not clear from these reports whether this is meant to feed into a human health risk assessment. Our comments pertain to the assessment of both environmental impacts and human health impacts.

Overall, in both plans the following should be considered:

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FOIPPA s. 13(1)  
FOIPPA s. 13(1)  
FOIPPA s. 13(1)

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In addition, the following comments are specific for each report.

In the report: Detailed Noise Modelling Plan the following should be taken into consideration:

FOIPPA s. 13(1)  
FOIPPA s. 13(1)

2

In the report Detailed Dispersion Modelling Plan the following should be considered:

This is a brief overview given an initial look at these documents.



## ADVICE TO MINISTER

Sincerely,

Catherine Elliott MD MHSc CCFP FRCPC(c)

Physician Epidemiologist

Environmental Health Services

National Collaborating Centre for Environmental Health

FOIPPA s. 13(1)

FOIPPA s. 13(1)

FOIPPA s. 13(1)

FOIPPA s. 13(1)

FOIPPA s. 15(1)(k)

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## ADVICE TO MINISTER

Environmental Health Services

National Collaborating Centre for Environmental Health

FOIPPA s. 13(1)

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- The main point to be taken from these letters is that our public health experts all agree – an important part of the Environmental Assessment process for the Ajax mine is a health impact assessment for this project by the proponent, to ensure that the concerns around public health are understood and addressed.
- I've been informed that Interior Health's Chief Medical Health Officer Dr. Andrew Larder is monitoring this process, making sure that the modeling done by the proponent will address all the potential impacts on the health of the public, noise, sound, dust, air quality etc. The redacted letter included advice from the BCCDC on this.
- This proposal is unique in its proximity within Kamloops, so an assessment is really the only way we will be able to gather the information needed.
- For further details on the application process and recommendations from Interior Health, I recommend you speak with IH.

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- Interior Health believes that the letter is a heavily redacted letter from BCCDC outlining their review of documents about any potential health impact of the proposed mine (SEE APPENDIX FOR A COPY OF THIS LETTER). This is based on comments in media that the letter cannot be commented on until it is released in its entirety, and that it is significant in what it hides – not what it says.
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- Portions of the document were redacted under FOI section 13 (policy advice) at the recommendation of PHSA/BCCDC.
- The general content of the letter (and others) is that health experts – those at BCCDC, IH and PHO – agree that a detailed health impact assessment should be undertaken by the proponent prior to the approval of this project.

- Given the uniqueness of the proposal – its proximity to a relatively large city and all that that entails – there are a number of public health aspects that we need information on before public health would be comfortable saying that the project should go forward.

### **Discussion and Advice**

- Interior Health's Chief Medical Health Officer Dr. Larder has informed Dr. Kendall that he has asked for modelling to be done to address each of the areas of this proposal that may affect the health of people living in the community.
- The redacted portions of BCCDC's letter included feedback related to what needed to be included in this modelling process.

Communications Contact: Laura Neufeld  
 Program Area Contact: Tim Lambert, Perry Kendall, Interior Health,  
 BCCDC  
 File Created: June 26, 2013  
 File Updated:  
 File Location: Document3

Minister's Office	Program Area	Deputy	Media Manager
			Ryan Jabs



59-IH-2012\_2013  
 BCCDC Letter May 25,

## ADVICE TO MINISTER

<p><b>CONFIDENTIAL ISSUES NOTE</b></p> <p>Ministry: Health Date: June 27, 2013 Minister Responsible: Terry Lake</p>	<p><b>Ajax Mine -- FOI</b></p>
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### ADVICE AND RECOMMENDED RESPONSE:

- We take the health and safety of British Columbians very seriously, and are committed to balancing the benefits of resource development projects with ensuring environmental and public health and safety.
- That is why BCCDC and Interior Health have been involved in the Environmental Assessment process for Ajax since 2011.
- The main point to be taken from these letters is that our public health experts all agree – an important part of the Environmental Assessment process for the Ajax mine is a health impact assessment for this project by the proponent, to ensure that the concerns around public health are understood and addressed.
- I've been informed that Interior Health's Chief Medical Health Officer Dr. Andrew Larder is monitoring this process, making sure that the modeling done by the proponent will address all the potential impacts on the health of the public, noise, sound, dust, air quality etc. The redacted letter included advice from the BCCDC on this.
- This proposal is unique in its proximity within Kamloops, so an assessment is really the only way we will be able to gather the information needed.
- For further details on the application process and recommendations from Interior Health, I recommend you speak with IH.

### Regarding severing of the letter:

- Government and health authorities are committed to providing transparent information to the public on our decisions.
- There are legislative requirements that the health authorities as public bodies must follow when severing freedom of information requests.
- The health authorities have notified the ministry that the severed portions primarily relate to policy advice or recommendations and are considered protected under Section 13 of the Act.
- I can't speak to the specific reasons behind the severing decisions made by the BC Centre for Disease Control as the ministry was not involved in them. I encourage you to contact the BCCDC about these decisions.

### BACKGROUND REGARDING THE ISSUE:

- On Wed. June 26, the Kamloops Area Preservation Association issued a statement that they would be releasing a letter obtained via FOI from BCCDC to Interior Health

- outlining potential concerns with the Ajax Mine proposal.
- This will be released at 7:30 pm, June 26<sup>th</sup>.
- Interior Health believes that the letter is a heavily redacted letter from BCCDC outlining their review of documents about any potential health impact of the proposed mine (SEE APPENDIX FOR A COPY OF THIS LETTER). This is based on comments in media that the letter cannot be commented on until it is released in its entirety, and that it is significant in what it hides – not what it says.
- Should that be the letter in question, questions could be raised about why so much of the letter was redacted under FOI.
- Portions of the document were redacted under FOI section 13 (policy advice) at the recommendation of PHSA/BCCDC.
- The general content of the letter (and others) is that health experts – those at BCCDC, IH and PHO – agree that a detailed health impact assessment should be undertaken by the proponent prior to the approval of this project.
- Given the uniqueness of the proposal – its proximity to a relatively large city and all that that entails – there are a number of public health aspects that we need information on before public health would be comfortable saying that the project should go forward.

### **Discussion and Advice**

- Interior Health's Chief Medical Health Officer Dr. Larder has informed Dr. Kendall that he has asked for modelling to be done to address each of the areas of this proposal that may affect the health of people living in the community.
- The redacted portions of BCCDC's letter included feedback related to what needed to be included in this modelling process.

Communications Contact: Laura Neufeld  
 Program Area Contact: Tim Lambert, Perry Kendall, Interior Health, BCCDC  
 File Created: June 26, 2013  
 File Updated: June 27, 2013  
 File Location: Z:\Medstrat 2013\Operations\Issues Notes\Public Health\in\_Ajax Mine FOI\_draft\_June27\_930am.docx

Minister's Office	Program Area	Deputy	Media Manager
			Ryan Jabs



59-IH-2012\_2013  
 BCDC Letter May 25,



## ADVICE TO MINISTER

<b>CONFIDENTIAL ISSUES NOTE</b>  Ministry: Health Date: UPDATED: June 12, 2013 Minister Responsible: Health	<b>Ajax Mine</b>
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### ADVICE AND RECOMMENDED RESPONSE:

- The proposed Ajax Mine project is currently undergoing a rigorous environmental review by both provincial and federal environmental assessment offices.
- The Interior Health Authority's Health Protection team is participating in the provincial review as part of a provincial working group that includes a variety of stakeholders.
- Interior Health-Health Protection has been reviewing submissions by KGHM Ajax Mining Inc. to ensure the information provided allows for a proper evaluate of the proposal from an environmental health hazard perspective.
- At this stage in the provincial review process, KGHM Ajax Mining Inc. needs -to submit their final proposal for review by the Environmental Assessment Office and the working group.
- At this time, Interior Health neither supports nor objects to the Ajax Mine application. The Health Protection department's job is to identify the potential environmental health risks associated with the mine.
- Ultimately, the approval of this proposal depends on the outcome of the environmental assessment. The Minister of Environment and the Minister of Energy and Mines will make an informed decision on this project once the assessment process is finished.
- I would refer you to the B.C. Environmental Assessment Office's public website for more information on this review process.

### *If asked about physician recruitment challenges due to Ajax:*

- Kamloops physicians, like all local residents, will have their own perspectives about the Ajax Mine project, and we respect those opinions.
- Our government takes the issue of physician recruitment very seriously – that's why we've taken significant steps to improve all British Columbians' – including the residents of Kamloops and the surrounding communities - access to physician services.
- These efforts are paying off in B.C. – in one decade between 2001 and 2011, the number of physicians billing has increased from 8,234 to 10,121 – or 23 per cent.
- Our hope is that any physician will consider all factors in making decisions on where to practice, including access to amenities such as schools, recreation and the quality of services, including our health services that Kamloops has to offer.

## BACKGROUND REGARDING THE ISSUE:

- KGHM Ajax Mining Inc. has proposed to develop a \$535 million open pit copper mine at the southwest edge of Kamloops, B.C.
- The proposed mine falls partially within the City of Kamloops boundaries and is located just south of the city – one to two kilometres from residential neighbourhoods.
- The proposed project has polarized Kamloops residents, with those basing their support on the economic benefits to the community (approximately \$6 billion in direct spending over the 23-year life of the mine, about 1,000 construction jobs and a further 400 full-time jobs during operation), while others basing some of their opposition on concerns regarding the environmental and health impact resulting from the mine.
- Media and some physicians have suggested physician recruitment may be affected by the mine.
- The project is currently under review by the B.C. Environmental Assessment Office with a coordinated review by the federal government's Canadian Environmental Assessment Agency.
- The Environmental Assessment Office has issued the Final Application Information Requirements and the next stage is for the proponent (KGHM Ajax Mining Inc.) to submit their application at which point the EAO will have 180 days to review the application.
- The Canadian Environmental Assessment Office is also conducting a review in coordination with the B.C. Environmental Assessment Office and they are at a similar stage.
- The Canadian Environmental Assessment Office has asked the proponent to submit their Environmental Impact Statement (similar to B.C. EAO's Final Application Information) for review.

Communications Contact: Trish Rorison

Program Area Contact:

File Created: June 12, 2013

File Updated:

File Location: G:\Medstrat 2013\Operations\Issues Notes\Public Health

Minister's Office	Program Area	Deputy	Media Manager
			Ryan Jabs

## ADVICE TO MINISTER

### CONFIDENTIAL ISSUES NOTE

Ministry: Energy and Mines

Date: June 2013

Minister Responsible: Hon. Bill Bennett

## Ajax Mine - Kamloops

### SUGGESTED RESPONSES:

- **The Project is in the pre-application stage of a comprehensive federal/provincial environmental assessment process.**
- **In early 2012, the federal and provincial government hosted public information sessions to explain the purpose and content of Ajax's Environmental Impact Statement (EIS) documents.**
- **The sessions were to seek input from the public on whether the information contained in the application would satisfy their interests and concerns.**
- **Staff members from both levels of government as well as KGHM Ajax Mining Inc. were on hand to answer questions regarding the proposed Project's environmental assessment process.**
- **If the project is approved, it will generate 580 construction jobs, 380 full-time jobs during operations, plus tax revenue, royalties and benefits for governments, local communities and First Nations, including the Tk'emlúps and Skeetchestn Indian Bands.**

### BACKGROUND:

The Ajax project is a proposed, open-pit copper-gold mine located near and partly within the city limits of Kamloops, British Columbia, in an area of past production. Current infrastructure includes mill buildings, shop facilities, tailings area, haul road, water rights and related permits.

The 2011 feasibility study, noted the Ajax mine is projected to produce 109 million pounds of copper and 99,000 ounces of gold annually over its 23-year mine life.

If the project is approved, it would generate 580 construction jobs, 380 full-time jobs during operations, plus tax revenue, royalties and benefits for governments, local communities and First Nations, including the Tk'emlúps and Skeetchestn Indian Bands.

Community concerns brought forward on the project relate to dust, blasting vibration, aesthetics, potential economic and environmental impacts on housing, ground water hydrology, and potential environmental impacts to Jacko Lake, among others.

## ADVICE TO MINISTER

Communications Contact:	Michelle Hynes	250 952-0650
Program Area Contact:		
File Created:	2013	
File Updated:		
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Minister's Office	Program Area A/ADM	Deputy	Comm. Dir