



February 17, 2022

François Houde,
Directeur général
Direction générale du suivi de l'état de l'environnement
MELCC, édifice Marie-Guyart, 7e étage, boîte 22
675, boulevard René-Lévesque Est
Québec (Québec) G1R 5V7,

SUBJECT: Public consultation on the draft regulation to adjust the ambient air nickel standard

Dear Mr. Houde,

On behalf of the members of the KEAC, I would like to thank you and your colleagues for meeting with us on February 2, 2022 to discuss the Ministère de l'Environnement et de la Lutte contre les changements climatiques' (MELCC) proposed regulation to adjust the ambient air nickel standard. This file is of particular interest to the KEAC since there are two active nickel mines in Nunavik, both of which are located near Deception Bay. The fragile ecosystem in this area contains an abundance of terrestrial and aquatic species, which are also widely used by the Inuit of Kangiqsujuaq and Salluit for traditional subsistence activities.

The MELCC's proposed regulation intends to raise the concentration of airborne nickel particulate from 14ng/m³ to 70ng/m³ over 24 hours (20 ng/m³ annually). If these new standards are implemented, they must be respected at the closest *récepteurs sensibles*. If these new standards are exceeded at 300m or more from a given nickel processing installation, the project proponent must demonstrate appropriate mitigation measures however; this does not necessarily ensure that the new standard will be respected. To ensure compliance on the part of proponents, the KEAC recommends that the MELCC put measures in place ensure that proponents adhere to the new 300m standard.

According to the toxicology studies available on the MELCC's website, the effects of nickel-based compounds on the human respiratory system are widely understood and the experts who provided an independent review of regulatory framework generally agree with the proposed levels of nickel particulate. However, the effects of these substances on plants, fish and animals, in particular those found in tundra ecosystems such as Nunavik, are not obvious and the KEAC would like these to be included under the definition of *récepteurs sensibles*. In addition, we do not fully understand the effect this might have on the humans that consume these resources. In other words, the KEAC is concerned with how this proposed increase in nickel particulate emissions from the Raglan and Canadian Royalties mines in the region could affect the food chain through biomagnification. This is why it is essential that the MELCC implement a monitoring program in response to the proposed increase to ambient air nickel standards and the data obtained be transmitted to the monitoring committees for both mines as well as the Nunavik Regional Board of Health and Social Services.

KEAC Secretariat
P.O. Box 930, Kuujjuaq QC J0M 1C0
Tel.: 819-964-2961, ext. 2287
Fax: 819-964-0694
Email: bpatenaude@krg.ca

The KEAC is aware of the economic benefits of this proposed regulatory amendment. However, as our committee is mandated to ensure regulations such as this respect the environmental and social protection regime for the territory covered under the James Bay and North Québec Agreement, we insist that the MELCC not dismiss the potential impact on the natural milieu nor the Inuit who live and work there.

Sincerely,



Tunu Napartuk
Chairperson- KEAC

KEAC Secretariat
P.O. Box 930, Kuujuaq QC J0M 1C0
Tel.: 819-964-2961, ext. 2287
Fax: 819-964-0694
Email: bpatenaude@krg.ca