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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

February 18, 2020

BAPE Commission for the review the inventory and management
of asbestos and asbestos mine tailings in Québec
140, Grande Allée Est
Bureau 650
Québec, QC
G1R 5N6

**SUBJECT: Inclusion of the Asbestos Hill mine site in the BAPE's review of the inventory and management
of asbestos and asbestos mine tailings**

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA) and is governed by the Environment Quality Act and the James Bay and Northern Québec Native Claims Settlement Act. The KEAC is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. It is therefore the preferential and official forum for the Government of Canada, the Québec Government, the Kativik Regional Government (KRG) and the northern villages.

The Bureau d'Audiences Public sur l'Environnement (BAPE) has been mandated by the Ministry of Environment and the Fight Against Climate Change (MELCC) to review the inventory and management of asbestos and asbestos mine tailings in Québec. The KEAC is pleased to note that the Asbestos Hill mine site (known locally as Purtunig), located in the Ungava Trough sector of Nunavik, is one of the projects of interest for the commission responsible for carrying out this mandate, even if no consultation is planned in the region.

The Asbestos Hill mine is owned by Société Asbestos Limités and was in operation from 1972 to 1984. By the end of its operation, the Société Asbestos Limités had built an open-pit asbestos mine that had an average annual extraction output of 1,550,000 tonnes of asbestos fibre, which was partially processed on-site, then shipped to the company's finishing mill in Germany.

During its operation and since its closure, Inuit communities have voiced their concerns regarding the environmental effects of the tailings situated at the site. Inuit see humans, animals, and the environment as intrinsically linked to one another, with each affecting and relying on the other. As hunters and active participants in community country food sharing, Nunavimmiut put a great deal of importance on the wellbeing of the environment and of wildlife as it is directly linked to their cultural and personal identity.

During the operation of the Asbestos Hill mine, residents of Salluit and Kangiqsujuaq expressed concerns about the movement of asbestos fibers and dust between the mine site and the port facility at Deception Bay, located

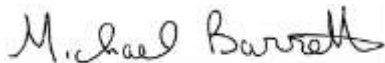
approximately 50 kilometers away. This area is important to these communities as many of its residents have seasonal camps in that sector and the area is an important hunting and fishing ground.

Further to the mine's closure, another mining company, today known as Glencore, acquired properties in proximity to the site and port facilities in an agreement that included a remediation program that took place from 1994 to 2004. However, this did little to respond to growing concerns of many residents and today they continue to question the effectiveness of the remediation measures undertaken. Community members have repeatedly expressed concerns with erosion and the exposure of buried material at the site. There remain questions regarding the level of contamination from tailings and their overall impacts, specifically on water and air quality.

The KEAC has been informed that the Ministry of Energy and Natural Resources has commissioned a characterization study of the Asbestos Hill site. The results of which, should be available in the spring 2020 and would include recommendations for the possible continued remediation of the site. It will be important to communicate the results of the characterization study to the concerned communities and concerned regional organizations, but also to be transparent regarding site remediation and its implications for the area.

Due to the significance of the Asbestos Hill site to Nunavik Inuit, the KEAC feel it relevant that it be part of the BAPE's current review of asbestos and asbestos mine tailings in Québec. Furthermore, as part of our mandate, the KEAC is ready to collaborate again with the BAPE regarding a possible participation or in-depth consultation in the Nunavik region, as we have done in the past during the generic uranium hearings. If you have any questions, please do not hesitate to contact the KEAC secretariat.

Sincerely,



Michael Barrett
Chairperson, KEAC

c.c.

Marc Croteau, Provincial Administrator, JBNQA
Philippe Bourke, President, BAPE