

John Horgan, Premier

RE: STOP Mount Polley Mining Corporation's Discharge of Mine Effluent into THE ONCE Pristine Quesnel Lake

The Concerned Citizens of Quesnel Lake are saying "NO" to the discharge of toxic mine waste water into Quesnel Lake and we strongly urge the New BC Government to rescind the amended permit #11678.

BACKGROUND

When applying for their initial operating permits in the 1990's, Mount Polley Mining Corporation (MPMC) specified that no effluent would be discharged into the receiving environment. That promise was unceremoniously broken when MPMC's tailings dam failed on August 4, 2014 resulting in the "worst disaster in Canadian mining history".¹ Now, in what appears to be a massive bait-and-switch scheme, MPMC has the audacity to ask for permission and be granted to dump up to 10,000,000m³ per year of toxic mine waste into the once pristine waters of Quesnel Lake. Think about the kind of precedent this sets; are we the kind of society that lets corporate interests double down their mistakes for the sake of their bottom line?

At the very minimum, any water discharged into Quesnel Lake should be fully treated to match the receiving water quality. We do not accept the proposal by MPMC that only measures effluent discharge against BC Water Quality Guidelines (BC WQG) after it has been diluted in a massive volume of water, Quesnel Lake. Contaminated water diluted with clean water is still contaminated water.

Measuring water quality only outside a 100m Initial Dilution Zone is unacceptable for a body of water that BC Parks described as "...contain(ing) important habitat for fish species which support a host of species... streams, shores and wetlands of the park have been designated ... as critical habitat for salmon and bull trout as part of the Cariboo-Chilcotin Land Use Plan".²

MPMC is attempting to pass off the least costly long-term water management solution as being the most environmentally responsible and socially acceptable. With over \$500 million of net positive cash flow³ at stake, MPMC has the resources available to implement a truly responsible long-term water management plan, which the Concerned Citizens of Quesnel Lake demand.

It is widely known that MPMC was warned many times about the water levels in the Tailings Storage Facility (TSF). As a matter of fact, water should never have been stored in the TSF! Despite this and other evidence, MPMC was found not criminally responsible for the tailings dam failure. Regardless of any legal ruling, those of us who rely on the lake as primary or recreational residences know where the fault lies and have yet to see MPMC be held responsible for their actions. We will not stand by as they attempt to undermine the very environmental standards they pledged to uphold nearly 20 years ago and we will not accept regressive policies that threaten the Quesnel Lake watershed.

In the debate over Mount Polley Mining Corporation's (MPMC) application to discharge effluent into Quesnel Lake, the community is split between environmental stewardship and the economic interests of the community at large. What we are failing to see, is that the two sides don't have to be at odds with one another. In the Mount Polley Mine 2016 Technical Report, MPMC presents the financial facts proving the ongoing operation of the mine to be a

¹ <http://news.nationalpost.com/news/canada/anger-and-confusion-after-worst-disaster-in-canadian-mining-history-darkens-prosperous-b-c-town>

² BC Parks 2015 Quesnel Lake Park Management Plan

³ <https://www.imperialmetals.com/assets/docs/mp-technical-report-may-20-2016.pdf>
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viable business venture. The report projects a total net cash flow (revenues less operating, capital and off-site costs) of \$502 million over the mine's remaining 11-year lifespan. Among the capital costs is an allowance of \$9 million to implement the current long term water management plan favoured by MPMC to discharge mine effluent directly into Quesnel Lake. In other words, less than a half of a percent 1% of the total projected revenues are being directed towards effluent treatment.

With half a billion dollars of profit at stake, Imperial Metals isn't likely to walk away from the Mount Polley site. Pushing MPMC to be more environmentally responsible in their long-term water management plans may lead to slightly reduced profits for the corporation, but it will not put the mine's viability or the jobs associated with it into question. As a community, we should not be afraid to stand united and demand MPMC and the BC Government to do better for this community. MPMC only plans to be around for the next 11 years, do we want their impact on Quesnel Lake to last generations?

THE ISSUES

We submit that the discharge of contaminated effluent directly to Quesnel Lake should not be allowed for the following reasons;

- a. There is insufficient evidence to support the apparent conclusion that the use of an Initial Dilution Zone (IDZ) would not cause significant adverse effects and it allows MPMC to externalize the cost of water treatment at the expense of the receiving environment and the people, animals, and plants that rely on the pristine waters of Quesnel Lake.
- b. An Initial Dilution Zone (IDZ) should certainly not be allowed where the best available technology ("BAT") has not been applied. In this case, the Ministry of Environment (MoE) dismissed evidence of BAT that may have been available and failed to require MPMC to undertake sufficient investigation of potential alternatives.
- c. In addition to potential alternative technologies for reducing contaminant levels, the Ministry did not require MPMC to sufficiently investigate potential alternative approaches to the discharge, including alternate discharge points or the development of site-specific water quality objectives based on the conditions of Quesnel Lake prior to the Mine tailings breach.
- d. If BAT best available technology could not sufficiently reduce the contaminant levels in the effluent to the applicable standards, the MoE should not have permitted MPMC to discharge effluent to Quesnel Lake until such an alternative was developed.
- e. No discharge of effluent to Quesnel Lake should be permitted until the cumulative long-term effects of the initial Mine tailings breach are fully understood (cumulative impacts at play already).
- f. The permitted discharge will increase the contaminant load in Quesnel Lake, including for metals such as selenium and arsenic that bioaccumulate in the food chain, and of nutrients that have and will continue to impact the oligotrophic nature of the Lake. Soluble copper was recently identified as a problem with the exposed tailings below Polley Lake, and there are many tonnes of tailings that have been deposited into Quesnel Lake. Because the long-term impact of the Mine tailings breach on Quesnel Lake remains unknown, it is difficult to distinguish between impacts that may have resulted from the initial Mine tailings breach on the one hand, and those that may be caused by the ongoing permitted releases, and their contribution to the total contaminant load on the other hand.

For example, since the initial Mine tailings breach, Quesnel Lake residents have noted an increase in algal growth along the shoreline, slime and discolouration coatings on beach rocks, and the

development of a previously unseen green tint in the lake water. In addition, the water filters of residents drawing their drinking water from the Lake have begun clogging with sediment much more quickly than prior to the spill. These phenomena have been dismissed by the Province and MPMC, and no serious investigation of the potential links between resident observations and either the Mine tailings breach or the ongoing discharge took place prior to the issuing of the Amended permit.

- g. Tailings were also deposited in Polley Lake by the Mine tailings breach. The long-term impacts to Polley Lake are also not fully known, and water from Polley Lake drains down Hazeltine Creek into Quesnel Lake.
- h. In addition, ongoing research by the University of Northern British Columbia's Quesnel River Research Centre ("UNBC") on the effects of the spill may be impeded by interference from ongoing releases of contaminants authorized by the Amendment. Preliminary data from UNBC studies that were provided to residents and submitted to the Ministry of Environment have indicated significant change from the conditions that existed prior to the Mine tailings breach, and probable effects on water quality since the Mine tailings breach and discharge have not been acknowledged or acted upon by the Ministry.

CCQL DEMANDS

1. That the Government initiate a full scale public inquiry into the Mount Polley Dam failure;
2. That the April 7, 2017 Amended Permit #11678 to discharge into Quesnel Lake be set aside;
3. That the Government develop site specific water quality criteria based on the water quality of Quesnel Lake prior to the Mine tailings breach, which will ensure the Lake water quality and aquatic environment are not impacted by the effluent discharge and, at the least, ensure that the characteristics of the discharge at the outlet of the treatment plant meet B.C. Water Quality Guidelines prior to entering Quesnel Lake;
4. That the Government form a citizens' monitoring committee, which would be involved in obtaining data and/or monitoring data from the effluent discharge, and would be involved for the duration of the Amended Permit #11678, with adequate funding provided on a sustained basis by the Ministry or MPMC to hire independent experts to review the information on behalf of locally affected residents;
5. Make all data and reporting available publicly online in a timely manner, not only at the Williams Lake library;
6. Use BAT, including a superior treatment plant that will reduce the contamination entering Quesnel Lake;
7. Ensure that sufficient research is conducted on the long-term impacts on the Quesnel Lake ecosystem of both the Mine tailings breach and the permitted effluent discharge to allow a determination of whether the permitted effluent discharge is causing incremental adverse effects over and above those caused by the spill; and
8. Report on whether the permitted discharge may change the trophic state of the lake, and increase algal and other biological growth effects in Quesnel Lake, which can negatively affect water quality and enjoyment of the Lake.

Signed by; ***The Concerned Citizens of Quesnel Lake***

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