



Environmental Health Program, Atlantic Region
Regulatory Operations and Enforcement Branch
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November 14, 2024

Karen Lalonde
Impact Assessment Agency of Canada
200 - 1801 Hollis St.
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Sent by e-mail to: Karen.Lalonde@iaac-aeic.gc.ca and boatharbour@iaac-aeic.gc.ca

Subject: Health Canada's Comments on the Draft Environmental Assessment Report and Draft Potential Conditions for the Boat Harbour Remediation Project

Dear Karen Lalonde:

Thank you for the Impact Assessment Agency of Canada's (IAAC) October 15, 2024, invitation to comment on the *Draft Environmental Assessment Report* (draft EA report) and *Draft Potential Federal Conditions* (draft conditions) for the Boat Harbour Remediation Project. Health Canada (HC) is participating in the environmental assessment process as a Federal Authority under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012). For projects reviewed under CEAA 2012, HC's review is limited to biophysical health.

As requested, the Department reviewed the draft EA report and draft conditions. The findings in the draft EA report related to HC's mandate were appropriately reflected in the draft conditions, and HC's comments and views were appropriately reflected in the draft EA report, except for the following:

- HC's comments on daily exposure limits are insufficiently reflected in section 5.3.1 of the draft EA report and potential condition 5.3.4 in the draft conditions; and
- Key mitigation measures in the draft EA report on dust suppression are not appropriately reflected in draft federal condition 5.1.1.

HC has provided more detailed comments for IAAC's consideration in the Table below.

HC is available to provide specialist or expert information and knowledge, upon request, in developing specific follow-up plans as part of draft conditions relevant to HC's mandate.

Should you have any questions regarding HC's comments, please contact Lauchie MacLean at Lachlan.MacLean@hc-sc.gc.ca.

Sincerely,

For Chantal Roberge

National Director, Environmental Health Programs (EHP),
Regulatory Operations and Enforcement Branch (ROEB), HC

cc: Heather Jones-Otazo, Acting Director, Chemicals and Environmental Health Management Bureau, Healthy Environments and Consumer Safety Branch (HECSB), HC
Beverly Ramos-Casey, Atlantic Regional Manager, EHP, ROEB, HC
Wendy Wilson, Senior Environmental Health Specialist, Environmental Assessment Division, HECSB, HC
Alexandra Iliescu, Environmental Assessment Coordinator, Environmental Assessment Division, HECSB, HC
Lauchie MacLean, Impact Assessment Specialist, EHP, ROEB, HC

Attachment: Health Canada's Comments on the Draft Environmental Assessment Report and Draft Potential Conditions for the Boat Harbour Remediation Project (November 14, 2024)

Health Canada’s Comments on the Draft Environmental Assessment Report and Draft Potential Conditions for the Boat Harbour Remediation Project (November 14, 2024)

Comment Number	Report Section or Condition	Reviewer Comment	Suggested Change
HC-1	<p>Draft EA Report Section 5.3.1</p> <p>Draft Potential Conditions Condition 5.3.4</p>	<p>Language related to use of toxicological reference values is unclear or missing.</p> <p>In section 5.3.1 of the <i>Draft Environmental Assessment Report</i> (page 48), IAAC’s summary of HC’s concerns with the Proponent’s Human Health and Ecological Risk Assessment (HHERA) is not clear:</p> <p><i>Health Canada expressed concerns about the results of the HHERA, which may result in the Proponent proposing remedial objectives that would not be fully protective of human health. Concerns included the methods in which certain exposure pathways were eliminated, the use of values which may not be appropriate for all future land-uses, and the use of unverified assumptions.</i></p> <p>HC acknowledges the need to provide plain language wording; however, the use of the word “values” in the Draft EA Report does not clearly articulate HC’s concerns with the Proponent’s use of sub-chronic toxicological reference values (i.e. daily exposure limits) in its site-specific target levels.</p> <p>In condition 5.3.4 of the <i>Draft Potential Conditions</i> (page 13), HC notes that the use of “appropriate toxicological reference values” is not included. Additionally, the inclusion of consultation with HC is missing in this condition and should be reflected as is seen in conditions 5.3.1, 5.3.5 and 5.3.6.</p>	<p>HC recommends replacing “values” with “daily exposure limits” to increase clarity in the following sentence in section 5.3.1 of the <i>Draft Environmental Assessment Report</i> (page 48): <i>Concerns included the methods in which certain exposure pathways were eliminated, the use of values daily exposure limits that may not be appropriate for all future land-uses, and reliance on unverified assumptions.</i></p> <p>HC recommends rewording condition 5.3.4 to the following for clarity: <i>Identify, in consultation with Health Canada, contaminants of potential concern, relevant toxicological reference values, potential human receptors, and operable exposure pathways, based on the results of monitoring conducted pursuant to condition 5.3.2.</i></p>
HC-2	<p>Draft Potential Conditions Condition 5.1.1</p>	<p>Potential human exposure to chemical dust suppressants was not assessed.</p> <p>Condition 5.1.1 of the <i>Draft Potential Conditions</i> (page 12) states that the proponent is to:</p> <p><i>apply water or other dust suppressants on access roads during periods when dust generation is expected or occurring...</i></p> <p>HC notes that the Proponent stated in the EIS, and in its response to a HC information request (IAAC-58) around the potential use of chemical suppressants, that only fresh potable water was considered for dust suppression.</p>	<p>HC recommends that “or other dust suppressants” be removed from condition 5.1.1.</p> <p>Alternatively, if a chemical dust suppressant other than water is intended to be used, the Proponent should provide to HC and other relevant stakeholders a description of the dust suppressant, its potential human exposures and associated risks, and any modified or additional measures to mitigate any health effect that may result from its use.</p>