

Vermilion River Stewardship



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Alex Blasko, Special Project Manager
Ministry of the Environment
Environmental Assessment and Approvals Branch
2 St. Clair Avenue West, Floor 12A
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E-mail alex.blasko@ontario.ca

Dear Mr. Blasko:

**Re: Terms of Reference for Cliffs Chromite Project Individual Environmental Assessment
Ferrochrome Processing Facility (FPF)**

Vermilion River Stewardship (VRS) acts as a voice for the Vermilion River and its Watershed, and our mission is to work to build partnerships and strategic alliances with all other interested parties, communities, stewardships, organizations, agencies and industry to ensure clean and healthy water quality; and a balanced and sustainable ecosystem and natural habitat.

VRS wishes to comment on the Terms of Reference for the Cliffs Chromite Project Individual Environmental Assessment. The proposed Ferrochrome Processing Plant (FPF) is contained within the catchment area of the Vermilion River and its watershed, so our concerns and comments are as follows:

1. Water Taking:

- a. Is there a possibility that water will be taken from the Vermilion River or its tributaries for the purposes of this project?
- b. If so, what amount of water would be taken on an average daily basis, and for what purpose?

2. Effluent Discharge & Treatment:

- a. Will effluent be discharged from this FPP?

- b. If so, would this effluent be treated before being discharged?
 - c. If so, how would this effluent be treated?
 - d. What heavy metals, chemicals and toxic substances would remain in the effluent after treatment?
 - e. Where and how would this effluent be discharged?
 - f. Would this effluent be harmful to the public and/or aquatic life?
 - g. What harmful effects could this effluent have on the public and workers' health?
- 3. Drinking Water Sources:**
- a. How would this project affect the major public drinking water sources at:
 - i. Lake Wahnapiatae, Capreol, and the Vale public water intake on the Vermilion River?
 - b. How would this project affect water quality of private water intakes downstream along the Vermilion River.
- 4. Power Source:**
- a. Is there a possibility of Cliffs generating their own electricity by building a hydroelectric generating station on the Vermilion River?
 - b. VRS would be opposed to this scenario.

5. Sustainability:

The Canadian and Ontario governments have adopted the *precautionary principle*, and the Ontario government has adopted an *ecosystem approach* through its Statements of Environmental Values (SEV). Adequate information must be included in the Environmental Assessment to enable approving agencies to ensure the SEVs are met, in areas such as cumulative effects, and effects on aquatic life and habitat. In such instances the agencies will need to strongly invoke the *precautionary principle*.

What would be the cumulative effects resulting from emissions, effluent discharge, run-off, hydroelectric transmissions lines, road building/maintenance, and storage of waste from processing, etc., on:

- a. The general health of the Vermilion River and its ecosystem;
 - b. Water quality and water quantity;
 - c. Aquatic life and habitat; and
 - d. Public health and safety.
- 6. Environmental, Ecological & Economic Cost Benefit Analysis:**
- VRS requests an environmental, ecological and economic cost benefit analysis which uses a real ecosystem services approach to environmental valuation – as endorsed by the United Nation's Millennium Ecosystem Assessment approach. This would explicitly recognize and value the broad range of benefits that we and future generations receive both from this environment and, in particular, the Vermilion River, and from any potential development.
- 7. Accessible Documents:**
- VRS notes that the Terms of Reference document is locked, and therefore not accessible to highlighting, cutting and pasting. VRS requests that all future documents be unlocked to make it easier for stakeholders to work with the documents when preparing comments.

VRS is grateful for this opportunity to comment on these Terms of Reference for the proposed Cliffs Chromite Project, and looks forward to your response.

Sincerely,



Linda Heron
Chair, Vermilion River Stewardship

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