

AR128384

June 23, 2015

Ms. Jennifer Steber
Executive Vice President of Stakeholder and Government Relations
Alberta Energy Regulator
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Calgary, Alberta T2P 0R4

Mr. Cal Hill
Executive Vice President of the Strategy and Regulatory Division
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Dear Ms. Steber and Mr. Hill:

Alberta Health has reviewed the May 2015 version of the Obed Human Health Risk Assessment (HHRA).

This version of the Obed HHRA has an improved level of detail, clarity and documentation. Consequently, Alberta Health has a significantly better understanding of the approach used to assess human health risk and the results of the assessment for the area of impact delineated by Westmoreland Coal.

This is the first version of the HHRA that Alberta Health has reviewed in its entirety since the first version submitted in May 2014. Consequently, we are posing a number of questions for further clarification (Attachment 1). Health Canada has also reviewed and we have incorporated their comments into our response.

Exposure assessment related to consumption of fish remains a key uncertainty and gap. Consequently, this section of the HHRA remains a less comprehensive screening level assessment. Further justification for fish species selection should be provided and future monitoring to assess any changes in contaminant concentrations in fish and risk to human health is recommended. We encourage Westmoreland Coal to continue actively communicating and working with affected stakeholders (sport fishermen and women and First Nations and Métis communities) to glean consumption information and address this question.

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The May 2015 version of the HHRA should not be viewed as a completion of all the necessary health risk assessment required for the Obed incident, but rather an interim step that provides the basis for additional monitoring and assessment to understand long-term risk to human health. It is also very likely that other stakeholders will identify gaps (e.g., in datasets) that will have to be addressed to satisfy their own concerns and perspectives about long-term impacts to human health. For this reason, we strongly recommend that Westmoreland Coal publically release this updated version of the HHRA with a simple release date or version number, rather than with the term “final”.

Sincerely,



Linda Mattern
Assistant Deputy Minister
Health System Accountability and Performance

cc: Brian Olson, Obed EPO Director, Manager Mining West, Enforcement and Surveillance
Alberta Energy Regulator
Ken Dahl, Regional Coordinator Mining West, Environment and Operational
Performance, Alberta Energy Regulator