

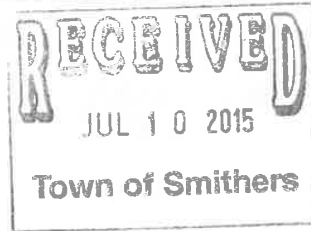
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July 10, 2015



Ms. Deborah Sargent, Chief Administrative Officer  
 PO Box 279, 1027 Aldous Street  
 Smithers, BC  
 V0J 2N0

Dear Ms. Sargent:

Thank you very much for your letter and attached documents surrounding air quality concerns in Smithers. We hope the following response is useful and informative.

**Regarding the correspondence with reference to section 83 of the Public Health Act**

The intent of the municipal role under the *Public Health Act* is to report a real or perceived health hazard, when they become aware of one, to the Medical Health Officers within the appropriate regional health authority. *As such, by providing us with your letter you have satisfied your obligation under the Act.*

We will work in partnership with MOE to assess the NEWPRO permit application and address recommendations to mitigate potential health effects should the permit be approved by the Ministry of Environment (MoE). For your knowledge and interest, the correspondence refers to local government being required to "do certain things prescribed by the Act and regulations" however there are currently no prescribed regulations under Section 83 of the *Public Health Act*.

**Regarding general concerns around BVLD air shed management**

It is well understood that poor air quality negatively affects health. The largest air quality health concern in the BVLD air shed is particulate matter (PM). PM can be classified as fine (2.5 micrometers or smaller = PM 2.5) or coarse PM 10 (2.5-10 micrometers in diameter) and is linked to a wide variety of respiratory and cardiovascular disease. Particulate matter (PM) in outdoor air pollution is also designated a Group I carcinogen by the International Agency for Research on Cancer (IARC) based on the evidence regarding the relationship of PM 2.5 and PM 10 to lung cancer risk. Health effects from PM can occur from both acute and long-term exposure and from both the finer (PM2.5) and coarser (PM10) fractions of PM; however, it is understood that the highest burden of disease originates from the long-term exposure to the finer PM2.5 particles. Recent evidence suggests that ambient PM 2.5 air pollution has an important mortality burden, even in regions with relatively low PM 2.5 concentrations.

There are no known "safe" levels for particulate matter. With regards to PM, the ALARA (As Low As Reasonably Achievable) approach is generally employed. While this may be challenging from a policy perspective, it also means that any continuous improvement efforts in air quality will result in corresponding improvements to public health. From our perspective, this provides some real opportunities for emitters, both industrial and non-industrial, within the BVLD air shed to reduce their emissions with resulting positive improvements to the health of the communities in which they reside. We also support the ALARA principle, recognizing the importance of air quality to health but also the reality that some people continue to rely on wood burning stoves to heat their homes or require motor vehicles to get to and from work, as well as importance of sustainable socio economic opportunities and employment as significant determinants of health.

We know that Smithers is located in a sensitive air shed with various emission sources. Although outdated (e.g. Beehive Burners no longer exists within the air Shed) the draft Ministry of Environment Micro Emissions Inventory for the BVLD air shed released data from 2002 which provides a sense of the many sources of pollution in the area and their proportional contributions to the air shed.

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Dir/CS	<input checked="" type="checkbox"/>	Dir/AVO	<input checked="" type="checkbox"/>	Bldg Ina	<input type="checkbox"/>	In-Cam Date:	
Admin Asst.	<input type="checkbox"/>	Fjro	<input checked="" type="checkbox"/>	Planner	<input type="checkbox"/>	Agenda Placement:	Supplanted
Dir/Rec	<input checked="" type="checkbox"/>	Air Mgr	<input checked="" type="checkbox"/>	PCSO	<input type="checkbox"/>	Other:	Email Council ES staff

From the Office of the Chief Medical Health Officer  
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