



NUNATSIAVUT
kavamanga Government

Nunatsiavut Allatinga
Nunatsiavut Secretariat

August 15, 2017

Hon. Dwight Ball, Premier
Confederation Building, East Block
P.O. Box 8700
St. John's, NL A1B 4J6

Dear Premier,

The Nunatsiavut Government is very concerned with the current situation in relation to the water levels of the Muskrat Falls reservoir and the view of Nalcor Energy that methylmercury production is not taking place in the impounded area. Following our last teleconference that included Nalcor and SNC Lavalin officials we received additional information from Deanne Fisher of Nalcor.

As you know the commitment to lower the water levels were made on October 26, 2016. The recent correspondence provided to us indicates that SNC Lavalin raised the risk concerns around the lowering of water levels after the land has become saturated as early as October 28, 2016 and again on June 21, 2017. It is unacceptable that these concerns and risks were not brought back to the indigenous leaders for further discussion until July 2017, 9 months after the commitments were agreed to and long after the water levels were due to be lowered in the spring.

The concerns of the Nunatsiavut Government, in relation to the communication between SNC-Lavalin, Government of Newfoundland and Labrador (GNL) and Azimuth Consulting are as follows:

1. There was a commitment from the GNL to the Indigenous leaders that water levels would be lowered this past spring, which has not been respected. The unknown risk of a landslide does not outweigh the risk of methylmercury production in both the reservoir and Lake Melville as a result of the current impoundment of the reservoir. There is peer-reviewed scientific literature that has shown that methylmercury production will increase as a result of maintaining this current impoundment level.
2. SNC-Lavalin clearly stated in the June 21, 2017 letter to Nalcor that water levels could be lowered at 0.5m per 24 hour period. It is the Nunatsiavut Government's position that this lowering of the reservoir begin immediately to reduce methylmercury production and provide an opportunity for mitigation measures in the impounded area.
3. It is clear that it is SNC-Lavalin's position that once water levels are raised in the reservoir, they should not be lowered. It is absolutely imperative that water levels not be raised again until all mitigation measures proposed by the IEAC are implemented.
4. There are significant issues with the Azimuth Consulting opinion. The assumptions and analyses presented in this letter are inaccurate and misleading. It is clear that Azimuth does not correctly understand the Churchill River and Lake Melville ecosystem nor have they considered the peer

reviewed science that has been conducted on this system. There is no safe level of methylmercury, and suggesting that small increases are not an issue clearly shows their lack of understanding. Bioaccumulation and biomagnification, especially in the Lake Melville ecosystem, are what needs to be considered in relation to methylmercury concentrations in water. Furthermore, the analyses by Azimuth do not consider the summer period, which is when methylmercury production is highest. Opinion pieces like the one from Azimuth Consulting show the complete disconnect between the Muskrat Falls Hydroelectric project and the clear evidence of impacts on the Lake Melville ecosystem, which will directly affect the people of Labrador.

It is the expectation of the Nunatsiavut Government that the Independent Expert Advisory Committee be tasked to discuss these urgent issues, review the letters from SNC-Lavalin and the Azimuth opinion, and develop a plan to move forward immediately on how best to mitigate methylmercury production.

Furthermore, the Government of Newfoundland and Labrador made a commitment to the Indigenous leaders on October 26th, 2016 to ensure all steps possible would be taken to protect the health and well-being of the people of Labrador, and this is currently not being honoured. The Nunatsiavut Government expects immediate action on these issues to protect the health and well-being of Inuit.

Sincerely,



Johannes Lampe
President

cc. Dr. Ken Reimer, Chairperson of the Independent Expert Advisory Committee
Stan Marshall, Nalcor Energy
Anastasia Qupee, Grand Chief, Innu Nation
Todd Russell, Nunatukavut