



North American Metals Council  
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July 17, 2019

Via E-Mail

Jacqueline Gonçalves  
Director General, Science and Risk Assessment Directorate  
Environment and Climate Change Canada  
351 Saint-Joseph Boulevard  
Gatineau, QC K1A 0H3  
Canada

Re: Input on the Draft Federal Water Quality Guideline for Copper,  
May 2019; Canada Gazette, Part I, Volume 153, Number 20:  
Government Notices, May 18, 2019

Dear Director General Gonçalves:

The North American Metals Council (NAMC)<sup>1</sup> is pleased to submit this letter in support of the comments submitted by the Copper Development Association (CDA) regarding Environment and Climate Change Canada's (ECCC) draft Federal Water Quality Guideline (FWQG) for copper, released in May 2019.

Specifically, NAMC supports CDA's substantive recommended additions to the FWQG Fact Sheet and the Biotic Ligand Model (BLM) User Manual, including the following six suggestions proposed by CDA:

1. Provide clearer instructions on how to access the BLM and the BLM User Manual used to prepare the FWQG.
2. Include tables in the FWQG Fact Sheet with the FWQG copper concentrations calculated across a range of pH, hardness, and dissolved

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<sup>1</sup> NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American "metals industry") on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.



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organic carbon (DOC) concentrations, to allow users to access quickly an approximate FWQG for any water chemistry of interest.

3. Include a statement in the FWQG Fact Sheet on what should be done should a water chemistry of interest fall outside the prescribed ranges for BLM input parameters. Such a statement would allow for the incorporation of FWQG into activities associated with the Chemicals Management Plan (CMP).
4. Provide guidance in the FWQG Fact Sheet on what to do if the FWQG is calculated using the simplified-site-chemistry option.
5. Include a link in the FWQG Fact Sheet and in the BLM User Manual to a compilation of surface-water chemistry data used to calculate the median ion ratios across Canada.
6. Include a table listing the reported and observed water chemistry parameters for all 78 toxicity endpoints used for construction of the chronic copper species sensitivity distribution (SSD), as this would provide users with a different calculating method.

Thank you for the opportunity to comment. Please contact me at [kroberts@namc.org](mailto:kroberts@namc.org) with any questions.

Sincerely,

Kathleen M. Roberts  
NAMC Executive Director