



[BY E-MAIL]

To: Canadian Environmental Law Association

c/o Fe de Leon, MPH
Researcher and paralegal
55 University Avenue, 15th floor
Toronto, Ontario
M5J 2H7
deleonf@cela.ca

By: MiningWatch Canada

Rodrigue Turgeon, lawyer, J.D., M.S.V.D.
and Jamie Kneen
National Program Co-Lead
4, Florence Street, Suite 210
Ottawa, Ontario
K2P 0W7
rodrigue@miningwatch.ca

**Comments on NPRI (National Pollutant Release Inventory)
Facilities in Basse-Ville de Québec**

March 28, 2025

In Canada, the National Pollutant Release Inventory (NPRI) is the means by which Canadians can access information on pollutants released into the environment from emitting companies. It helps Indigenous Nations, governments, scientists and civil society identify priorities for action to protect public health and the environment.

Public access to the NPRI is through its web page.¹

In March 2024, the Québec Ministry of the Environment published a report stating that data obtained from provincial sampling stations established a link in Québec City between “the cycle of ships docked at Glencore’s facilities and the increases in nickel found [in the air of the Basse-Ville neighborhood]”.²

The purpose of our submission is to provide the NPRI Working Group with a report about the different facilities subjected to the NPRI in the Basse-Ville neighbourhood of Québec City and identify data that may be related to mining operations (transshipment, ore transport) at the Port of Québec. To do this, we check whether the NPRI presents data on atmospheric nickel emissions in this sector. In the presence or absence of such data, we make recommendations aimed at better documenting atmospheric emissions of mineral substances into the air of Québec City.

¹ Government of Canada, National Pollutant Release Inventory,
<https://pollution-waste.canada.ca/national-release-inventory/>

² David Rémillard. Nickel au port de Québec : le ministère de l'Environnement blâme Glencore. 19 March 2024.
Radio-Canada. Online: <https://ici.radio-canada.ca/nouvelle/2058208/glencore-avis-non-conformite-nickel-quebec>

This submission is only a minor contribution to the established work of many local organizations living in Québec City, who understand well the importance of publishing information on air emissions through the NPRI. These organizations and initiatives include the Vigilance Port de Québec committee, Revolvair, the Conseil de quartier du Vieux-Limoilou, the Conseil de Quartier de Maizerets and the Conseil de quartier de Lairet. Considering that these organizations are increasingly paying attention to PM2.5 emissions in their neighbourhoods, we will include this data in our report so as to present recommendations that may also be of use to them.

As organizations independent from government and industry, our mission is to better know the effects of the industrial and fugitive air emissions in this neighbourhood and its effects on the population and the environment. Similar to our March 2023 publication about the Horne Smelter in Rouyn-Noranda,³ the following submission identifies and proposes responses to the gaps and shortcomings in mining-related information in the application of the NPRI and its accessibility and utility to communities and researchers.

NPRI-listed facilities in the Basse-Ville of Québec City

The NPRI lists over 300 pollutants from more than 7,000 facilities across Canada.⁴ Like many other port cities, Québec City has a high concentration of industrial facilities in its port district. In its Basse-Ville (Lower Town) sector alone,⁵ which includes the port zone and the Limoilou, Saint-Roch and Saint-Sauveur districts, nine (9) facilities are listed in the register, as shown in the following table.⁶ For each of the selected facilities, we researched the reported atmospheric emissions of nickel and PM2.5. The choice of these indicators will be explained later in this report.

³ MiningWatch Canada, Comments on NPRI (National Pollutant Release Inventory), Air Release Outline, 15 March 2023.

⁴ Government of Canada, NPRI, <https://www.canada.ca/fr/services/environnement/pollution-gestion-dechets/inventaire-national-rejets-polluants.html>

⁵ WIKIPEDIA, Basse-Ville de Québec, https://fr.wikipedia.org/wiki/Basse-Ville_de_Qu%C3%A9bec

⁶ Government of Canada, NPRI, *op. cit.*

	Company	Installation	Sector	Location	Nickel air emission (2023, tons per year)	PM2.5 (2023, tons per year)
1	QSL Canada Inc.	Terminal de Beauport (28670)	Marine Cargo Handling - 488320	Port zone	No reported data	1.,35
2	IMTT-Québec inc.	IMTT QUÉBEC - QUÉBEC (5539)	Other warehousing and storage - 493190	Port zone	No reported data	No reported data
3	Parkland terminals of Eastern Canada	Québec City (8734)	Other warehousing and storage - 493190	Port zone	No reported data	No reported data
4	Stadacona WB S.E.C.	Usine de Québec (4068)	Newsprint mills - 322122	Port zone	No reported data	5.,66
5	Ville de Québec	Incinérateur (211)	Waste treatment and disposal - 562210	Port zone	No reported data	14.,34
6	Ville de Québec	Station Est d'épuration des eaux usées (6356)	Sewage treatment facilities - 221302	Port zone	No reported data	No reported data
7	G3 Canada Limited	G3 Canada Limited - Québec City Plant (11012)	Oilseed and grain merchant wholesalers - 411120	Port zone	No reported data	9.,06
8	Rothmans, Benson & Hedges Inc.	Usine de Québec (8708)	Tobacco product manufacturing - 312220	Saint-Roch	No reported data	0.,51
9	Agropur Coopérative	Agropur Coopérative - Usine de Québec (27680)	Dairy product manufacturing - 3115	Limoilou	No reported data	No reported data
Total					No reported data	30.,92 tons in 2023

First, we find that no NPRI-registered facility in Québec City's Basse-Ville area has reported data on nickel emissions released into the air in 2023. This is understandable in the case of the newsprint mill, the wastewater treatment plant, the oilseed and cereal grain merchant, the manufacturer of tobacco products and the manufacturer of butter, cheese and dry and concentrated dairy products, since these establishments are not – at least not directly – part of the mining industry. The situation is more intriguing with regard to the Terminal de Beauport (QSL Canada Inc.) and the two other establishments carrying out warehousing activities at the Port of Québec (MTT-Québec Inc. and Parkland Terminals of Eastern Canada), given that the nature of their operations could very well lead them to emit mineral substances into the air during the transshipment and handling of their merchandise.

In the same year, only five (5) of the nine (9) facilities reported data on their PM_{2.5} emissions in the sector, including four (4) of the seven (7) facilities located in the port area.

Although incomplete, this data indicates that the residents of Québec City's Lower Town are exposed to a considerable concentration of PM_{2.5}. In 2023, a total of 30.92 tonnes of PM_{2.5} were emitted into the air in Québec City's Basse-Ville by five NPRI-registered industrial facilities.

Without even taking into consideration nickel emissions into the air – given they are not included in the NPRI – we note that the cumulative impacts of air contaminant emissions to which residents are exposed are significant and must be reduced to ensure the protection of public health.

Review of NPRI coverage of contaminants generated by mining releases

As mentioned above, the data reported and recorded in the NPRI do not provide a clear and complete picture of air pollution resulting from the handling, storage, transshipment and transportation of mineral substances at the Port of Québec.

The NPRI 2023 Facilities Map provides little or no detail in this regard.⁷ Although the Map is one of the main online research tools for the public, it is not possible to see where the material processed at the Port of Québec comes from, or whether mineral substances are processed there and released in part into the atmosphere. In fact, the register doesn't even contain a section for companies to report the release of nickel and other mineral substances into the air of Québec City's Basse-Ville. Given that this substance is frequently emitted into the air during port operations, the lack of trackable data is cause for significant concern.

We conclude that the NPRI does not present any data on atmospheric emissions of nickel (Ni) and other heavy metals emitted during operations in the Port of Québec.

This notable gap in data prevents the register from providing a clear picture for the public regarding the extent to which atmospheric emissions of mineral substances add up to other contaminants emitted by facilities in Québec City's Basse-Ville, including PM_{2.5}.

⁷ Government of Canada, NPRI, <https://www.canada.ca/fr/environnement-changement-climatique/services/inventaire-national-rejets-polluants/outils-re-sources-donnees/carte-inrp.html>

Potential linking of emissions data to their actual mining sources

In the absence of NPRI-recorded information on nickel air emissions at the Port of Québec, the public must rely on the reported measures taken by the provincial government.

In March 2024, the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs du Québec (MELCCFP) stated publicly that the giant extractive multinational Glencore was exceeded the air standards for nickel emissions in the Limoilou district of Québec City's Basse-Ville. In a report on its monitoring program, the Ministry stated that "a relationship exists between the cycle of ships docked at Glencore's facilities and the increases in nickel found at the Québec-Vieux-Limoilou station."⁸

The fact that Glencore is multiplying its environmental violations at the Port of Québec is even more worrisome given that the Québec government already lowered air emission standards for nickel in its *Clean Air Regulation* in 2022.⁹

Data obtained from the Government of Québec confirms that Glencore is using the Port of Québec in its operations. Therefore, we recommend to the NPRI Officer to require Glencore to report its air emission in the Basse-Ville of Québec City to the NPRI. In our view, this is the simplest solution, given that no other industrial facility registered with the NPRI reports air emissions for nickel.

The other option would be to ask the Terminal de Beauport (QSL Canada Inc.) and the two other facilities involved in warehousing activities at the Port of Québec (MTT-Québec inc. and Parkland terminals of Eastern Canada) to measure and report this data to the NPRI. This solution seems less relevant to us, since it would prevent the public from establishing a direct link with the source of the emissions – in this case Glencore.

An additional layer of data is required to ensure transparency in measuring the release of mineral substances into the air. The NPRI should provide information on the source of the nickel released. As Glencore is a multinational company with many sources of supply for metals of all kinds, the NPRI should provide information linking the type of nickel found in the air of Québec's Basse-Ville to different mining sites across Glencore's global mining network.

Support the remarkable RevolvAir initiative

The widespread air contamination in Québec City's Basse-Ville has led residents to organize for years to push governments to implement plans that guarantee their health and safety by limiting polluters' atmospheric emissions. The Vigilance Port de Québec committee has long played an important role in this respect; the Conseil de quartier du Vieux-Limoilou, the Conseil de Quartier de Maizerets and the Conseil de quartier de Lairet are also very active. Residents have long campaigned around the issue of air quality as it relates to the release of nickel and other heavy metals by industrial activities in the Québec port area.

⁸ Radio-Canada. *op. cit.*

⁹ MiningWatch Canada. The Quebec Government Announced it Will Lower Air Quality Regulations for Nickel. This is Why That's a Bad Idea. 4 March 2022. Online: <https://miningwatch.ca/node/10884>

Recently, a remarkable local initiative in Québec City resulted in the creation of RevolvAir, whose mission is to provide residents with affordable sampling tools to help them better understand indoor and outdoor air quality.¹⁰

The aim of this initiative is “to build a community of committed citizens who wish to contribute to the analysis of air quality in their neighbourhoods and cities.” Québec City is home to the largest number of citizen sampling stations in Canada, with the highest concentration located in the city's Basse-Ville area.

RevolvAir offers citizens across Canada a tool for measuring air quality, with data published continuously and accessible free of charge on its website. What's more, this platform is unique in that it combines citizen data with NPRI data.

The methodology also includes an interesting calculation presenting the “Benefit per ton of PM 2.5 reduced,” an index aimed at “improving the health of citizens by reducing fine particulate matter.” For example, for the Beauport Terminal (QSL Canada Inc), we can read that the company could save \$609,620 by reducing PM2.5 emissions:

By reducing its emissions of fine particulate matter (PM 2.5), this industry could decrease the costs related to health problems caused by fine particles. For the year 2021 only, this potential is estimated at \$609,620. This claim is based on a 2022 Health Canada study titled “Health benefits per tonne of air pollutant emissions reduction.”¹¹

The RevolvAir website even contains an interface where you can produce reports including tables, graphs and timelines to show the evolution of air quality measured at citizen sampling stations.¹²

This initiative needs to be encouraged, supported, expanded and properly funded.

The citizen measurement stations deployed in Québec City's Basse-Ville area measure PM2.5. Considering Glencore's atmospheric emissions at the Port of Québec, it would be optimal to equip them with tools to measure nickel and other mineral substances being released into the air.

¹⁰ RevolvAir Pollution, <https://pollution.revolvair.org/en>

¹¹ RevolvAir Pollution, Terminal de Beauport - QSL Canada Inc., <https://pollution.revolvair.org/en/enterprise/ca/qc/quebec/qsl-canada-inc-terminal-de-beauport-quebec-28670> (consulted 13 March 2025).

¹² RevolvAirDash, <https://app.revolvair.org/revolvair/analysis>

Recommendations

Reduction of Air pollutants

- Reduce the release of airborne contaminants to which residents are exposed in the Basse-Ville of Québec City to ensure the protection of public health

Improvement to NPRI

- Investigate and report why Glencore does not report under the NPRI on its airborne nickel emissions in the Basse-Ville of Québec City
- Add to the NPRI the economic calculation of “Benefit per ton of PM 2.5 reduced” based on the 2022 Health Canada study titled “Health benefits per tonne of air pollutant emissions reduction”
- Add trucking to the NPRI Reporting requirements fact sheet in order to keep track of the PM2.5 emissions
- Reporting to the NPRI should be mandatory, not voluntary. All Port companies should be required to report contaminants from all terminals

Improvements to NPRI reporting

- Measure and publish data on air emissions of nickel and other mineral substances in the Basse-Ville of Québec City
- Require Glencore report to the NPRI on its airborne nickel emissions in the Basse-Ville of Québec City
- Require the Terminal de Beauport (QSL Canada Inc.) and other facilities with warehousing activities at the Port of Québec (MTT-Québec inc. and Parkland terminals of Eastern Canada) measure and report data to NPRI on emissions of nickel and other mineral substances

NPRI outreach to communities

- Initiate discussions with civil society groups with a view to assessing whether the citizen samplers in the RevolvAir database could measure data on airborne emissions of nickel and other mineral substances and, if so, fund this program
- Organize a workshop with the residents of Québec City's Lower Town to discuss the use of NPRI and submit recommendations for its improvement
- Make the data easily interpretable for residents, so that they can familiarize themselves with the issue, sharpen their understanding, monitor, and organize to protect air quality and challenge companies and decision-makers as needed