



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Hon. Jonathan Wilkinson
Minister of Environment and Climate Change
Email: ec.ministre-minister.ec@canada.ca

Frontier Oil Sands Mine Project
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, ON, K1A 0H3
Email: iaac.conditions.aeic@canada.ca

November 23, 2019

Re: Frontier Oil Sands Mine Environmental Assessment Conditions

Dear Minister Wilkinson and Impact Assessment Agency:

Alberta Wilderness Association (AWA) appreciates the opportunity to comment on potential environmental assessment conditions for Teck's Frontier oil sands mine. **AWA urges the federal government to reject Teck's Frontier mine proposal.**

AWA believes that the conditional approval of this large oil sands mine will not uphold Canada's commitments to responsible, sustainable development, due to:

- significant adverse effects, at both project and regional cumulative levels, to biodiversity generally, and in particular to wetlands, old-growth forests, the Ronald Lake bison herd, and species at risk that rely upon wetlands and old-growth forest;
- significant adverse effects on indigenous rights, use of lands and resources, and culture;
- Alberta's overall lack of cumulative effects management for land disturbance, wetlands and biodiversity; and
- Alberta's weak financial security requirements for oil sands mine reclamation.

Founded in 1965, AWA works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

In its July 2019 [report](#), the joint federal-provincial review panel for Teck Frontier mine determined that:

- "the project is likely to result in significant adverse environmental effects to wetlands, old growth forests, wetland- and old-growth-reliant species at risk, the Ronald Lake bison herd, and biodiversity. The project is also likely to result in significant adverse effects to the asserted rights, use of lands and resources, and culture of indigenous groups who use the project area. The proposed mitigation measures have not been proven to be effective or to fully mitigate project effects on the environment or on indigenous rights, use of lands and resources, and culture." (p. xiii)

- “the project, in combination with other existing, approved, and planned projects, is likely to result in significant adverse cumulative environmental effects to wetlands, old-growth forests, wetland- and old-growth-reliant species at risk, fisher, Canada lynx, woodland caribou, the Ronald Lake bison herd, and will also contribute to existing significant adverse cumulative effects to the asserted rights, use of lands and resources, and culture of indigenous groups in the mineable oil sands region” (pp. xiii-xiv)

Alberta has no regulatory limits in northeast Alberta on land disturbance or on habitat loss for species sensitive to industrial disturbance. Oil sands industry applications up to and including the Frontier mine are exempted from Alberta’s wetland policy. Another large open pit bitumen mine will add to an already unacceptable level of cumulative loss to wetlands and old-growth forests, which will be particularly difficult to regenerate under anticipated climate change impacts to Alberta’s boreal region.

AWA is also very concerned about impacts to nearby Wood Buffalo National Park and the Peace-Athabasca Delta, one of the world’s largest freshwater deltas. The Teck Frontier mine lease is adjacent to a major North American migratory flyway along the Lower Athabasca River. Migratory birds and other wildlife that rely upon the Peace-Athabasca Delta could be affected by the increased toxicity of lands and water on the nearby mine site, and by increased cumulative risks to downstream Lower Athabasca River and Delta waters.

Alberta’s financial security requirements for oilsands mine reclamation liabilities lag behind other jurisdictions on this important responsibility. Canada’s Ecofiscal Commission’s July 2018 report identified Alberta’s oilsands mines liability gap as a pressing issue to address. It documented that Quebec and Yukon each have stringent up-front financial security requirements to motivate timely, progressive mine reclamation. By contrast, Alberta requires very little financial security as a proportion of incurred liabilities, until near a loosely defined ‘end-of-mine life’. This regulatory regime poses significant risks that un-reclaimed landscapes will become a long-term public burden, including contaminated tailings and sites and extensive regional fragmentation of native vegetation, habitat and watershed connectivity.

The Teck Frontier mine proposal falls far short of responsible resource development. AWA urges the federal government to reject Teck’s Frontier mine proposal.

Thank you for considering these concerns.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Carolyn Campbell
Conservation Specialist