



## Alberta Coal Policy

AWA believes the intent and environmental focus of the Alberta Coal Policy must be maintained or enhanced. The Policy was developed in 1976, following public hearings conducted throughout the province by the Environment Conservation Authority (ECA). Nearly 40 years later, concerns over development of natural landscapes have not lessened; indeed, concerns are more critical than ever.

The Alberta Coal Policy's intent was to formulate a royalty regime from coal production and to manage coal exploration and coal mines development in the province with special emphasis on the Eastern Slopes. In the mid seventies some Alberta government estimates were that as many as 40 mines would develop in the Foothills and Mountain coal regions.

At the same time the Alberta Government recognized public concern about the damage that unrestricted coal exploration and coal mines development would bring to the Eastern Slopes. The beauty and ecological significance of natural landscapes in many locations was and still is seen by large segments of the public as more valuable than the coal resource underlying them. Following ECA public hearings and internal coal resource and coal development potential studies by the ERCB the Alberta Government released the Alberta Coal Policy in mid 1976.

The current extent of applications for coal-bearing lands in Alberta's Eastern Slopes along with announced coal exploration or proposed coal mine development projects reflects a growing and anticipated international demand for coal. Similar intensification of coal activity is taking place in British Columbia. This is very reminiscent of the "coal rush" of the seventies. The Alberta Government is faced with the coal industry's demand to update the Coal Policy. However it is imperative that the government consider how large a portion of future exports of Canadian coal Alberta may share with British Columbia and how big that export is likely to be.

The Coal Association of Canada's October 2012 briefing note on the Alberta Coal Policy states support of a policy that creates certainty for the coal industry and investors as well as land category classifications that strike the right balance between fostering development of Alberta's abundant coal resources and strategic land use planning. AWA believes the coal industry's coal demand projections are not realistic and are similar to earlier eras when the international coal market required a certain amount of coking coal for relatively predictable global steel production. A time when coal mines failed and went bankrupt. It is unrealistic to look at Alberta's resources without considering the international market and even the rich coal deposits of British Columbia as part of the equation in Alberta's coal development plans.

Key elements of the initial recommendations that must form part of any new approach to land management associated with coal development include:

1. The policy includes zoning of coal-bearing lands into four categories which reflect the knowledge of coal distribution that resulted from geological mapping by the Alberta Research Council and the Geological Survey of Canada up to 1975 and coal exploration efforts in late sixties and early seventies. Maintaining and respecting the four categories of the policy is essential:





**Category 1** prohibits surface disturbance in some of the most scenic and valuable lands for wildlife habitat and watershed protection, as well as within nationally and provincially designated areas

**Category 2** allows only underground operations in foothills and mountainous areas deemed able to sustain such development

**Category 3** are lands that remain open to classification into one of the other three categories

**Category 4** allows underground or open pit operations but only in proximity to existing rail lines

On one hand the policy closed opportunity for mining in areas of sensitive mountain and especially alpine or semi-alpine environment, or in areas too distant from infrastructure and on the other hand the policy fully opened development in category 4 lands. Categories 2 and 3 are a compromise between the two perspectives.

2. Provisions must be made for fully assessing the environmental impact of any new mine or the re-opening of mines operated in the past.
3. New leases must not be permitted in Category 1 lands within the Coal Policy, in Prime Protection lands within the Eastern Slopes Policy or in areas assessed as “nationally or provincially environmentally significant” within the ESA designations.
4. Any new or re-opened mine must have a Surface Reclamation Plan backed by an adequate fund to ensure this work can be successfully completed.
5. Any new leases for coal-fired power plants should be subject to the greenhouse gas emissions regulations set out by Environment Canada.
6. The focus of new developments should be around category 4 areas that are near existing infrastructure. Category 4 coal development areas were carefully chosen for their reserve amounts, mineability and proximity to existing rail lines. There are opportunities to develop more Category 4 lands through the extension of existing mines and even new mines in several places. Existing 1976 Category 4 lands should be considered first and foremost in any increased Eastern Slopes mining ventures.
7. The rail leading to the Ram River and Strachan gas plants west of Red Deer provide an opportunity for mine development in the Ram River and Nordegg Coal Fields.
8. An extensive Environmental Impact Assessment must be completed and approved before development can proceed for any new coal mine projects.

