



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Honourable Frank Oberle
Minister of Energy
#408 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Sent Via Email: minister.energy@gov.ab.ca

October 10, 2014

Dear Minister Oberle,

RE: *Coal Development Policy for Alberta (1976)*

On behalf of Alberta Wilderness Association (AWA) congratulations on your recent appointment as Minister of Energy. AWA looks forward to an opportunity to meet with you soon. You may know that founded in 1965, AWA is a province-wide conservation organization with over 7,000 members and supporters in Alberta and around the world. AWA works throughout the province to promote awareness and protection of Alberta's wild lands, wildlife and wild waters.

In the past two years, we have been aware of discussion regarding changes that industry would like to see in the *Coal Development Policy for Alberta, 1976* (Coal Policy). The Coal Association of Canada called the policy outdated, and in a 2012 briefing note said it hampers new projects and creates uncertainty. Contrary to being outdated AWA knows that the current coal policy was built on sound geological and biological science and is regarded as one of Canada's most farsighted policies integrating energy and environment. AWA believes the intent and environmental focus of Alberta's coal policy must be **not only maintained but enhanced** in certain environmentally significant areas.

Previous to the establishment of the 1976 Coal Policy, largely unregulated exploration resulted in unprecedented land disturbance and habitat fragmentation. The ERCB recognized there was growing public concern about the damage that unrestricted coal exploration and mine development was causing along the Eastern Slopes. Informed scientists and engineers were hired to assess Alberta's coal reserves and develop a guiding policy that allowed coal development in some areas while protecting areas of paramount wildlife habitat and aesthetic values.

Today, Albertans' concerns about coal development projects in environmentally significant areas are even more critical; areas in which cumulative effects are already negatively impacting threatened wildlife and water quality. Maintaining healthy watersheds, wildlife habitat, biodiversity and places of beauty for tourism and recreation are undoubtedly of significant value to society; and most likely far more so than coal production.

AWA believes there are a number of important factors that must be considered when looking at our current policy.



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Alberta's Position as a World Coal Supplier

The value of metallurgical coal has dropped significantly from 2011, and there are sources much closer to primary Asian markets than Alberta coal. Australia, Mongolia, and our Canadian neighbours in British Columbia have large quantities of minable coking coal much closer to Asian markets. Building a clean, green image by celebrating our wildlife, intact forests, and pristine headwaters and promoting our Eastern Slopes through international and local tourism seems a more than viable option.

Category 2 – Environmental Concerns and Poor Viability

Many of Category 2 coal development areas within the Coal Policy were categorized as such not only for environmental concerns but also for economic viability. The Energy Resource Conservation Board (ERCB), now Alberta Energy Regulator (AER) placed these lands in a restrictive category for several reasons:

1. Seams of coal are often thin, steep, fractured, faulted and more complex than Category 4 seams
2. These lands are of significant value for ecological and aesthetic reasons
3. The coal deposits are largely inaccessible to rail transport

Allowing a new wave of coal exploration in Category 2 lands with new roads, drilling sites and land disturbance will likely result in them coming to the same conclusions as in the 1970's – only few mines would be economically viable. It seems most coal companies are looking for new surface mine possibilities in Category 2 lands which currently allow "limited exploration... under strict control but in which commercial development by surface mining will not normally be considered at the present time." Surface mines, especially at high elevations, are not easily reclaimable to natural conditions. Companies hoping to develop new mines in remote locations face huge transportation costs and will expect taxpayer supported rail access. It is AWA's opinion that Category 2 restrictions need to be further enhanced and not relaxed to allow more surface mine development.

Cumulative Effects

In the final draft of the South Saskatchewan Regional Plan, we were disappointed to see the Government of Alberta is considering coal development opportunities in a region with so many other competing land uses. When taking into account cumulative effects, adding land and water disturbances caused by large coal mine areas would be a significant regression from securing headwaters and recovering species at risk, two main objectives of the plan. As Alberta moves forward creating other land use plans that include the Eastern Slopes, ecologically compatible land uses should be a priority over coal exploration and development for the benefit of all Albertans.

AWA is adamant that all Category 1 lands be respected as off limits to exploration and development and only the most exceptional, viable sites in Category 2 lands be allowed to proceed towards underground mining development. No surface access in Category 2 lands should be allowed. The ecological and economical intent of



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

the Coal Policy must be honoured and enhanced in certain areas along the Eastern Slopes where there are higher value land uses.

We would welcome an opportunity to meet and discuss the coal policy and look forward to hearing from you at your earliest opportunity.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

Brittany Verbeek
Conservation Specialist

cc:

Gerri Protti, Chair AER, Gerard.protti@aer.ca

Kyle Fawcett, ESRD Minister ESRD.Minister@gov.ab.ca