



ALBERTA WILDERNESS ASSOCIATION
"Defending Wild Alberta through Awareness and Action"

April 13, 2018

Mr. Steve Oates
Environmental Assessment Scientist
Natural Resource Conservation Branch
Parks Canada
E-mail: Steve.Oates@pc.gc.ca

Re: Draft Strategic Environmental Assessment for Wood Buffalo National Park

Dear Mr. Oates:

Thank you for this opportunity for Alberta Wilderness Association (AWA) to provide input on the draft Strategic Environmental Assessment (SEA) for Wood Buffalo National Park.

AWA, founded in 1965, 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.

During the UNESCO World Heritage Committee-IUCN's 2016 Reactive Monitoring Mission's visit to Alberta in October 2016, AWA participated in the Mission's NGO roundtable. We strongly support the Mikisew Cree First Nation's petition to the World Heritage Committee and its request for remedial action. AWA also supports the Mission's findings that Canada and provincial governments must strengthen protection of this World Heritage site.

Overall findings

The SEA is supposed to evaluate the cumulative impacts of development on Wood Buffalo National Park. Instead, the draft SEA is limited to a desktop review of previous research on the Park and development in the broader region. This research was generated in a system of weak or non-existent monitoring, focused on incremental project impacts, which largely ignored or minimized cumulative impacts of development and climate change.

The draft SEA points out the shortcomings of previous research. For example, "a comprehensive assessment of risks to migratory birds posed by the various [industrial] waterbodies at oil sands mines is not currently possible" (p. 4-13). And, while indigenous land users have long reported drastic declines in waterfowl numbers migrating through the Peace Athabasca Delta (PAD) (p. 4-18), SEA notes that "The long-term baseline data required to show broad-scale changes to migration routes, staging/stopover sites, and breeding sites are currently lacking" (p. 4-19). Overall, AWA believes that the draft SEA has failed to achieve a cumulative effects assessment that adequately captures the significant decline to the Outstanding Universal Values (OUVs) of the PAD, and the foreseeable further decline if 'business as usual' management continues.

The draft SEA affirms that the PAD is threatened in a number of ways, including:

- all pathways of effects and valued components are showing negative trends; and
- habitat quality has decreased for the internationally significant waterfowl populations converging from four continental migratory flyways in the PAD.

Yet the summary conclusion is too weak, as in this excerpt:

“Governments use a variety of tools to manage cumulative effects. However, the vast majority of the tools that are meant to be protecting the world heritage values of WBNP are either not yet in place, or have not been developed. With the desired outcomes for the PAD already not being met, predicted negative trends and inadequate management of cumulative effects mean the future of the Indigenous traditional ways of life and the ecosystems of the PAD are at risk, and that risk is increasing.” (draft SEA, p. EX-3)

Given inadequate past analyses and ongoing threats to the PAD, AWA requests that SEA state clearly that the OUVs of the PAD are suffering from adverse effects of development and have significantly declined below an acceptable level.

Tailings pond reclamation risk assessment

We agree that tailings ponds’ catastrophic failure, seepage, birds, and GHG emissions impacts on the PAD should undergo further risk assessment. However, the significant risk of inadequately reclaimed oil sands tailings is missing, and should be added to the description of stressors, as well as to the risk assessment recommendations in s. 7.3.3.

Tailings reclamation risks are both technical and financial (Campbell, 2017). There is no proven process yet to reclaim tailings or to safely release process-affected water into the Athabasca River. Tailing ponds were 234 km² in area and 1.1 trillion liters’ volume at the end of 2014, and keep growing.

For financial risks, Alberta oil sands mine operators’ self-reported reclamation liabilities were over \$27 billion as of June 2017. Only five percent of the funds estimated to reclaim current disturbed oil sands mine sites and tailings are now held by the Alberta government (Alberta Energy Regulator, 2017). Provided the mine operators meet a weak asset-liability test, they are only required to ramp up reclamation security payments to the provincial government fifteen years before a weakly defined ‘end of mine life’ date. This will be long after the prime revenue earning years of the mines are past, leaving a significant unfunded reclamation liability risk. The SEA should address this risk.

Thank you for considering these comments. We look forward to your reply.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Carolyn Campbell
Conservation Specialist

References: Alberta Energy Regulator, 2017. Mine Financial Security Program – Security and Liability. Campbell, Carolyn, 2017. “Cleaning Up After Ourselves: Oil Sands Mine Liability Program Needs Major Reform”, *Wild Lands Advocate* December 2017, 14-16.