

About The Government's Coal Consultation Survey

It's imperative to complete the government's survey on coal if you are concerned about the future of Alberta's Eastern Slopes. The link to the survey is on this [webpage](#). **The deadline for submitting your response is April 19th.**

Please be sure that, if there are teenagers and children in your household, they know they can complete the survey too. Their age category – 18 and under is included in the last few personal information questions. It's their future that's at stake here.

The survey isn't as objective as it should be. It's about "coal development," not about the future of the Eastern Slopes. Nonetheless it's vital for everyone to make time to complete it and to try to make it about the Eastern Slopes. One of the disappointments in Minister Savage's announcement of her Coal Policy Committee was the fact no terms of reference for the committee were released. This survey might help shape those terms.

What follows are some ideas based on how AWA responded to the survey's questions. Whether you find these ideas valuable or not, **AWA hopes your answers will help build the strong case that new coal mining shouldn't be allowed anywhere in Alberta's Rockies and Foothills. Not anywhere...period.**

Please note: The actual number assigned to each question will vary according to whether you give an answer that requires or invites elaboration.

Question: To what extent does the management of Alberta's coal resources affect you?
Major effect is our answer.

Question: Please describe how you are affected – this box/question won't appear if you answered "no effect" to the first question.

Many reasons figure here.

- Recreation, in all its forms, is one reason.
- The Eastern Slopes is an iconic landscape that is vital to the identity of individual Albertans, Canadians. They occupy an important place in the history and culture of First Nations.
- Coal mining affects valued species at risk in our Rockies and Foothills – grizzlies, westslope cutthroat trout, bull trout, whitebark pine.
- And, beyond the "you" in this question - we care about how coal mining affects others.
- What will the risk of selenium pollution and other types of pollution mean for all of us, including downstream users of these headwaters?
- What will coal mining's thirst for water mean for the quantity of water available for current landowners, First Nations, and downstream municipalities?

These are some reasons AWA believes coal mining affects "all Albertans."

Question: How important do you think the economic benefits of coal development are to Alberta and its communities.

Not important at all is our answer. Why? The government doesn't ask for reasons but here are ours. Coal mining has been in decline in Alberta for more than two decades. Statistics Canada tells us that, between 1997 and 2019, employment peaked in 1998. Then there were 2,985 coal mining jobs in Alberta. In 2019, there were only 1,542 jobs. There are even fewer now that Teck's Cardinal River operations have closed permanently. Phasing out thermal coal use in Alberta should shrink the sector even more.

This spiral of decline likely will continue due to the seriousness with which the steelmaking industry (the market for the metallurgical coal targeted by all of the talked about Alberta projects) is taking climate change. The International Energy Agency – not Greenpeace – predicts that metallurgical coal production will fall significantly over the next 20 years.

The royalties Alberta would receive from operating coal mines are miniscule (unless you believe royalties of 1% of gross revenue or 1% of gross revenue plus 13% of any profit that might be made are steep).

Any economic benefits pale in comparison to the damage coal mining will do to Alberta's lands and waters.

Question: How familiar are you with the details of the 1976 Coal Policy and regulation of coal development in Alberta?

Very familiar was our answer. AWA helped shape that policy. Ironically perhaps, AWA may have a better understanding of the 1976 Coal Policy than the people who drafted the preamble to this question. The preamble states that the Coal Policy "maximized the benefit to the resource owner – Albertans." Alberta's taxation and royalty structure hardly did that. Here's a [link](#) to the policy if you would like to read it.

Question: How familiar are you with the coal categories?

Very familiar was our answer. Here's a quick summary from the Policy:

Category 1: lands where "no exploration or commercial development will be permitted." (National Parks, Prov. Parks, Wilderness Areas, Natural Areas, Restricted Development Study Areas, Watershed Research Study Basins, Designated Recreation Areas, Designated Heritage Sites, Wildlife Sanctuaries, settled urban areas and major lakes and rivers).

Category 2: lands "in which limited exploration is desirable and may be permitted under strict control but in which commercial development by surface mining will not normally be considered at the present time."

Category 3: lands "in which exploration is desirable and may be permitted under appropriate control but in which development by surface or underground mining or in-situ operations will be approved subject to proper assurances respecting protection of the environment and reclamation of disturbed lands and as the provision of needed infrastructure is determined to be in the public interest."

Category 4: lands "in which exploration may be permitted under appropriate control and in which surface or underground mining or in-situ operations may be considered subject to proper assurances respecting protection of the environment and reclamation of disturbed lands."

For AWA there is no ecological support for the distinction between Category 2 and 4 lands. For this reason and because the dangers of selenium pollution weren't well-known in 1976 AWA opposes any coal mining in both Category 2 and 4 lands.

Question: Are you familiar with uses for metallurgical coal?

Yes was our answer. If you know that metallurgical coal is used primarily to make steel then you're familiar with its uses.

Question: Are you familiar with uses for thermal coal?

Yes was our answer. If you know that thermal coal is used primarily to generate electricity then you're familiar with its uses.

Question: Please rate your familiarity with coal exploration that is currently underway or has been carried out in the past.

Very familiar was our answer.

Question: How confident are you that coal exploration in Alberta is regulated to ensure it is safe, efficient, orderly, and environmentally responsible?

Not at all confident was our answer. We made this choice despite our firm belief that coal exploration regulation has been very efficient – for industry. This regulation has been anything but environmentally responsible. Public interest organizations have their statements of concern about exploration programs routinely rejected because these organizations are not considered to be “directly and adversely affected” by the exploration activities. The AER has approved drilling requests without giving them serious consideration – approving them in 24 hours or less.

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Question: How confident are you that coal development in Alberta is regulated to ensure it is safe, efficient, orderly and environmentally responsible?

Not at all confident was our answer. AWA cannot have any confidence in a regulatory system that always rejects public interest arguments because AWA is not “directly and adversely affected.” Alberta's regulatory system defines the public interest out of existence.

Question: Are there areas in the province that could be appropriate for coal exploration and development?

No was our answer. Metallurgical coal deposits in Alberta are found in the Rockies and Foothills. Since these are Category 1, 2, and 4 lands they should not be subject to coal mining. Thermal coal, found elsewhere in the province, should not be exploited – in part because of its contribution to greenhouse gas emissions.

Question: Are there areas in the province that should not be appropriate for coal exploration and development?

Yes was our answer.

Question: Please describe (if you answered yes to the immediately preceding question).

We described the areas previously. We explained why in that answer and in previous answers.

Question: As the committee engages with Albertans, what topics do you consider to be the most important when discussing Alberta's coal policy? Please rank in order of importance. AWA feels this question could be important to setting terms of reference. Our ranking privileges environmental considerations.

- If and where coal development takes place in Alberta (e.g. coal categories) Ranked #1.
- Approval processes for coal exploration. Ranked #3.
- Approval processes for coal development. Ranked #4.
- Regulatory oversight and enforcement for coal exploration. Ranked #5.
- Regulatory oversight and enforcement for coal development. Ranked #6.
- Providing an understanding of local economic and community impacts. Ranked # 8.
- Economic impacts of coal development. Ranked # 7.
- Environmental impacts of coal development. Ranked #2.

**Question: Do you think there are topics missing from this list?
Yes or no.**

Question: Public health measures could continue to prevent in person gatherings to some extent for the duration of the engagement. With that in mind, how would you like to engage with the committee?

There are a list of options here. AWA has stressed the importance of public hearings and the submission of briefs to the committee and answered this question accordingly.

Question: What aspects of the 1976 Coal Policy and regulation of coal exploration and development do you want to become more familiar with before participating in the engagement?

There are a number of issues raised here. AWA answered to say we feel we have more than enough information to participate responsibly in this consultation.

The last three Questions:

They ask for personal information here.

Thanks very much for considering the above and for taking the time to complete the government's survey. I hope you're enjoying this sunny Saturday!

All the best,
Ian Urquhart,
Conservation Director