

## **Another Report to Consider When You Write the Alberta Coal Policy Committee**

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There is a wealth of informed commentary on the Coal Policy Committee's website that recommends slamming the door on the coal industry. Virtually none of it has received attention in the mainstream media.

Five retired Fish and Wildlife biologists recently provided their submission to the Coal Policy Committee based on their nearly 50 years of experience dealing with coal development in the Eastern Slopes ("Insights on Coal Development from Five Retired Fish and Wildlife Biologists").

The report is by Fitch, Kneteman, Quinlan, Smith, and Sterling can be found in the Committee's [document library](#). It is comprehensive, pulls no punches, and is a counterpoint to the promises by coal companies, coal mining lobbyists such as the Coal Association, and the Alberta government on "stringent" environmental regulations and enforcement.

If you're going to write to Committee about what a coal policy should contain you might want to consider this summary of the biologists' conclusions. It comes from Lorne Fitch, a regular contributor to AWA's magazine *Wild Lands Advocate*.

- Cumulative effects assessments are not undertaken for coal exploration programs and, when done for coal development, are too narrow in scope to be effective predictors of issues and impacts.
- Coal mining operations in mountain and foothill settings, with steep terrain features are (and will be) subject to repetitive slope, road and settling pond failures, despite the application of engineering solutions. Every mine in the Eastern Slopes has had chronic and acute environmental issues.
- There is a tendency for coal mine proponents to avoid answers to some impacts by deferral to some other unstated, subsequent plan, action, monitoring, design or concept. It is virtually impossible then, to realistically determine outcomes and consequences of some mine operations and their cumulative impact on fish and wildlife populations, habitats and on native plant communities.
- Coal exploration and mining negatively impacts fish and wildlife populations and native plant communities. The risks to biodiversity are consistently underestimated, understated and imperfectly assessed.
- Mitigation/compensation actions proposed and undertaken tend to be untested, unproven, unsuitable, theoretical and overly optimistic.

- In most cases, monitoring proposed and undertaken for both coal exploration and development is not rigorous, robust or sensitive enough to detect changes and impacts in a timely manner for correction.
- Coal mines entirely remove existing, functional ecosystems replacing them with a completely foreign and poorly understood state. This altered state can have effects on ecosystems, water quality, lands, and fish and wildlife populations tens and possibly a hundred kilometers away from mine sites.
- Mine-site reclamation, as practiced, replaces intact, functioning and natural ecosystems with ill-adapted ones dominated by non-native plant communities that may need constant tending to persist.
- Government standards, oversight, monitoring and regulatory enforcement are insufficient to validate the promises made prior to mine development by governments and mine proponents for effective, “stringent” environmental protection during and after mine development.
- Legacy issues from coal exploration and development are rarely profiled and any learnings are routinely ignored. Coal mines in the Eastern Slopes are shown to produce significant issues with selenium contamination of receiving waters. The impacts of selenium on the aquatic environment and fish are not trivial. Current treatment methods are at best concepts, not proven technologies, and have not been demonstrated to be workable at mine scales, over lengthy time periods, including beyond mine life.
- Every independent cumulative effects assessment and associated study indicates that maintaining the status quo in land use (i.e., increasing the footprint) leads to, or has exceeded the thresholds for ecological integrity and resilience. Maintenance of any metric of ecological integrity (i.e., water quality, stream flows, biodiversity) cannot be assured with coal development, on top of timber harvest, petroleum development, and recreation (especially motorized forms).

These experts conclude the Eastern Slopes of Alberta’s Rockies is a very busy landscape where industrial development expectations already exceed the ability of the landscape to absorb these dreams. There are no longer places in the Eastern Slopes (including current Category 4 lands) where coal development can be safely, effectively, and environmentally accommodated.



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