



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

July 10, 2023

Lazare Eloundou Assomo, Director of World Heritage  
Haifa Al Mogrin, Chairperson

**Re: IUCN Reactive Monitoring Mission Report on Wood Buffalo National Park**

Dear Joint World Heritage Centre/IUCN Reactive Monitoring,

Alberta Wilderness Association (AWA) submits this statement of concern with regards to the recently published IUCN Reactive Monitoring Mission (RMM) Report on Wood Buffalo National Park (WBNP), released June 30, 2023 (for the reporting period of August 18 to 26, 2022), and to aid in the determination of whether WBNP should be included on the List of World Heritage Sites in Danger.

AWA's view is that recent events following the August 2022 RMM should demonstrate to the Joint World Heritage Centre/IUCN that WBNP meets the conditions for inscription on the List of World Heritage in Danger. In particular, the approval given by the Alberta Energy Regulator (AER) to Suncor for the expansion of the Fort Hills oil sands mine, which occurred in September 2022 and was not made aware to the mission and, therefore, was not considered in the mission report.

We encourage the World Heritage Committee member to consider these new threats, in addition to those described by the Reactive Monitoring Mission, when preparing a decision for the 45<sup>th</sup> World Heritage Committee meeting in Riyadh.

Our submission outlines the potential implications of the approved expansion of Suncor's Fort Hills oil sands mine into the McClelland Lake Wetland Complex (MLWC) on the Outstanding Universal Values (OUV) of WBNP and the Peace-Athabasca Delta (PAD).

**Introduction**

The Report published in June 2023 by the Joint World Heritage Centre/IUCN Reactive Monitoring Mission concludes that "most threats to the OUV of the property as identified by the 2016 remain valid today." Some of these identified threats include (but are not limited to): hydrology changes in the PAD, climate change, the impact of oil sands mining activities within the Athabasca River watershed, the risk posed by toxic tailings ponds and the lack of a tailings reclamation strategy, unaddressed cumulative effects of industrial developments, and the absence of buffer zone(s).

All of these aforementioned threats will be heightened if the approved expansion of Suncor's Fort Hill oil sands mine proceeds into the McClelland Lake Wetland Complex as planned in 2025.

The MLWC is a large wetland area, 90 kilometers north of Fort McMurray, near the confluence of the Firebag and Athabasca Rivers. The complex is dominated by peatlands, and features a beautiful and provincially significant patterned fen, with its characteristic string and flark topography (alternating peat ridges and shallow-water depressions). It has formed over the past eight to 11 thousand years, and has 12 sinkhole lakes, plus McClelland Lake itself.

According to a 2002 decision from the Alberta Energy and Utilities Board, Suncor is permitted to mine roughly half of the wetland complex so long as the ecological diversity and function of the unmined portion is maintained. A recent report produced by AWA raised concerns that Suncor's mitigation strategy – approved by the AER in September 2022 – poses a significant risk of irreversible damage to the unmined portion of the wetland complex.

The risks associated with this flawed mitigation plan have implications for the OUV of WBNP as well, and the threat of this expansion needs to be considered when determining whether the property meets the conditions for inscription on the List of World Heritage in Danger.

The following section outlines AWA's concerns about the Fort Hills mine expansion based on the Recommendations as outlined in the RMM WBNP Report.

### **Recommendations 2 to 6: Impacts to Water**

There is particular attention given to the Peace watershed, but impacts to environmental flows, hydrology, and water chemistry in the Athabasca River basin will have downstream impacts on the ecological integrity of the PAD as well. According to Suncor's own mitigation plan, intact muskeg (peatlands) around McClelland Lake provides important filtration for freshwater. McClelland Lake is one of the few clean freshwater sources left that drain into the Athabasca River via the Firebag River, and if the integrity wetland complex is compromised by the Fort Hills expansion, this could have negative consequences for WBNP and the PAD.

### **Recommendation 7 and 9: Tailings**

The expansion of Suncor's Fort Hills oil sands mine will increase both the area and volume of toxic tailings effluent stored across the landscape. This means an increased risk of seepage and spills, as we have seen recently with the news of the Imperial-owned Kearl oil sands leak, which had been occurring for nine months before Indigenous communities were notified. The Fort Hills oil sands project intends to produce an estimated 195,000 barrels of bitumen per day, and 12 to 15 barrels of tailings effluent are created for every one barrel of bitumen produced. Which means that the project proposed to add more than 2 million barrels of tailings to the landscape every day. More tailings mean an increased risk for potential impacts to the Athabasca River and downstream on WBNP and the PAD. The amount of freshwater needed for bitumen extraction will also have implications for flows in the Athabasca River that eventually reach WBNP and the PAD.

### **Recommendation 8: Oil Sands Monitoring**

Our concern here isn't specific to the proposed Fort Hills mine expansion. But rather, the Oil Sands Monitoring (OSM) Program has not published an annual State of the Environment (SoE) report since 2019. That's four years since the OSM Program – responsible for monitoring the impacts of oil sands

operations – last provided a comprehensive update for the public and decision makers on the findings of monitoring in the region.

Continued delays with the release of the SoE Reports means that the results gained from collected monitoring data and subsequent analyses are not being reported to decision-makers or the public in a timely and transparent manner. This means that those in decision-making roles are left without the knowledge needed to inform any relevant policy decisions.

### **Recommendations 10 and 11: Impact Assessments**

The expansion of the Fort Hills oil sands mine into McClelland was only subject to a provincial environmental impact assessment (EIA) and was not subject to a federal impact assessment. The provincial EIA did not fully consider the impacts of the project on the OUV of WBNP. Despite a provincial EIA being conducted, at the 2002 Energy and Utilities Board hearings to determine whether the project should proceed, TrueNorth (the project proponent at the time) withdrew the portion of its EIA describing the project's impacts to the MLWC but were still permitted to proceed.

According to the statement(s) provided by the Government of Alberta during those 2002 hearings:

“It agreed with TrueNorth's predictions that mining a portion of the fen in the manner described in the EIA would directly disturb the mined portion and indirectly damage the unmined portion by altering water levels and elevating the concentrations of certain chemicals. It agreed that McClelland Lake would be affected by the anticipated decline in lake level during the interval between mine dewatering and the discharge of runoff from the planned end-pit lake. It disagreed with TrueNorth's conclusion that changes in lake water quality would have no impact on aquatic life, stating that long-term changes in phytoplankton, zooplankton, and the macrophyte community were likely.”

Despite these views, the Energy and Utilities Board recommended that the Fort Hills mine expansion should proceed, conditioning its approval on the development of an acceptable mitigation plan prior to mining in the MLWC.

Even though a provincial EIA was conducted for this project, the negative environmental impacts to the MLWC were permitted to be dismissed, and no consideration was given as to how this mine expansion would impact the OUV of WBNP.

### **Recommendation 14: Flagship Species**

The MLWC lies directly within a major North American migratory bird flyway. Some 205 bird species have been recorded within the area, of which 116 are known to stay and breed. The wetland complex serves as an important stopover point for endangered whooping cranes on route to their breeding grounds further north, although they do not nest in the area. McClelland Lake is the largest relatively undisturbed freshwater body between Fort McMurray and the PAD. If McClelland Lake is harmed by the unforeseen impacts of mining, either through contamination or a loss of water, the only landing places for birds in the area – including whooping cranes – will be the toxic tailings ponds.

## **Recommendation 15: Buffer Zones**

In 1996, the MLWC was placed off-limits to oil sands mining within the approved Fort McMurray-Athabasca Oil Sands Subregional Integrated Resource Plan (IRP). Again, in 1999, the Alberta Special Places 2000 Committee nominated the complex for a protective notation as an environmentally significant area, which was intended to ensure that the area would be managed for conservation. If the MLWC were protected from mining, it could form a part of a broader network of connected areas that would serve as a buffer zone around the perimeter of WBNP.

## **Conclusion**

The RMM Report concludes that: “the OUV of the property continues to face important ascertained and potential threats, in particular as a result of changes to the hydrology of the PAD exacerbated by the impacts of climate change and the impacts of the industrial developments adjacent to the property.”

The Fort Hills mine expansion into the MLWC, if permitted to proceed, will increase the cumulative impacts of industrial development adjacent to WBNP, and will likely have impacts on the hydrology of the PAD by altering the flow regime from McClelland Lake to the Firebag and Athabasca Rivers. In addition, since this development is for the expansion of an oil sands mine, it will lead to increased greenhouse gas emissions, which have been identified as a primary driver of global warming and anthropogenic climate change.

For the reasons listed above, **Wood Buffalo National Park World Heritage Site should be added to the List of World Heritage in Danger.**

We encourage the World Heritage Committee member to consider these new threats, in addition to those described by the Reactive Monitoring Mission, when preparing a decision for the 45<sup>th</sup> World Heritage Committee meeting in Riyadh.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Phillip Meintzer  
Conservation Specialist