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Joint Review Panel Secretariat
Canadian Environmental Assessment Agency
2nd Floor, P.O. Box 15
9915 Franklin Avenue
Fort McMurray, AB T9K 2K4

October 1, 2012

Re: **Comments on the Shell Canada Jackpine Mine expansion project**

Reference number: 59540

Dear Sir/Madam:

Due to the considerable adverse environmental impacts of this proposal, we are asking that the Joint Review Panel reject the proposed Jackpine Mine expansion project. Canadians cannot afford to lock into major damage to our water, land and climate from further expansion of tar sands development.

Furthermore, given the constructional challenge brought forward by the Athabasca Chipewyan First Nation, we are concerned that Joint Review Panel process may not be the appropriate place to adequately address constitutional and treaty responsibilities for Aboriginal peoples.

According to documents released by Shell, the expansion project would exceed the hard limits set on air pollution by the province just months ago. Shell's own accounting shows that annual levels of sulphur dioxide and nitrogen dioxide will exceed firm limits set by the province's Lower Athabasca Regional Planⁱ. These limits were only recently put in place to prevent severe impacts from air pollution and acid rain in the region. It is unacceptable that a project aiming to exceed these levels could achieve approval.

Federal Departments have also expressed ongoing concern at the scale of impacts from this development. Environment Canada has raised concerns that Shell has inadequately assessed the impact of the project on wildlife habitat. The Department of Fisheries and Oceans is seeking to understand how impacts on fish species in the region can be mitigated or compensated for in questioning the cumulative impact of massive tar sands expansionⁱⁱ. These questions remained unanswered at this time.

Over the life of the project, the Jackpine mine expansion would create over 486 billion litres of tailings water. This polluted water threatens local wildlife, can contaminate nearby water sources, and is never returned to the natural water system.

The project would impact over 12,719 ha of land by mining and related activities and mine out 21 kilometres of the Muskeg River. Roughly one third of Alberta's woodland



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caribou lives in the tar sands region. Caribou herds in the area have declined more than 50 percent in recent years. This project will further exacerbate the ongoing decline in caribou numbers.

Ongoing air water and land degradation is also a serious threat to local and migratory birds, millions of which cross the region each yearⁱⁱⁱ.

Finally, the project's contribution to global warming is extreme. Just last year, the International Energy Agency warned that by continuing to build high carbon energy infrastructure of this kind, we will entirely use up our remaining carbon budget by 2017, all but eliminating our options for avoiding dangerous global warming^{iv}. The shell project will release at least 2.36 Mt CO₂e/year, every year for the life of the project. This one expansion project is equivalent to putting an additional 562,000 cars on the road, undermining efforts to fight global warming both in Canada and internationally.

We call upon you to uphold your responsibility to reduce pollution and damage to the environment by rejecting this project for the long-term health of Canadians and our shared ecosystem.

Sincerely,

Adam Scott
Program Manager
Environmental Defence

ⁱ <http://www.cbc.ca/news/technology/story/2012/09/11/edmonton-oilsands-pollution-acid-rain-limits.html>

ⁱⁱ <http://www.cbc.ca/news/technology/story/2012/08/27/sci-cp-jackpine-oilsands-shell-scientists.html>

ⁱⁱⁱ Timoney and Ronconi 2010 "Open pit bitumen extraction may exert population-level impacts upon migratory and resident birds, and is capable of causing mass mortality events."

^{iv} International Energy Agency, World Energy Outlook, 2012 <http://www.iea.org/publications/worldenergyoutlook/>