

From: Angela V. Carter <email address removed>
Sent: September 30, 2012 5:28 PM
To: Shell.Reviews [CEAA]
Subject: Submission re. Shell's Jackpine Expansion Proposal

Dear Joint Review Panel Secretariat,

I write to express concern about Shell Canada Limited's proposal to expand its Jackpine Mine Project and to recommend that the Joint Review Panel strongly advise the Government of Canada and the Government of Alberta to reject this proposal.

I base this recommendation on the research I have conducted since 2006 on unconventional oil development in Alberta. This work is focused on the provincial and federal environmental regulatory system surrounding the tar sands projects in Northern Alberta as well as on the political and economic pressures, risks, and benefits of the industry. Through this research, I have visited project sites several times and interviewed numerous key stakeholders, from industry officials and government representatives, to non-government organization representatives and First Nations community members living close to the development sites.

Based on this research, I am aware that the environmental impacts of the tar sands projects are extremely negative. This is due to the industry's contamination of water, land, and air, emissions contributing to climate change, destruction or fragmentation of habitat threatening species that are already at risk, and wasteful use of water resources in a drought-prone province.

The regulatory system intended to prevent or mitigate these outcomes is broken. As I document in my work, there are important regulatory gaps and inadequacies surrounding tar sands developments. For example, due to current lax policies carbon emissions are steeply rising. Freshwater extraction allowances are not sustainable: they will result in withdrawals that exceed watershed viability. Requirements for reclamation are not timely—the first examples of reclamation have taken decades—and nor do the requirements ensure that original landscapes and wetlands are restored. The current policy context is unable to assess cumulative impacts. Land use planning is delayed and, to date, inadequate. Overall, in this regulatory system environmental considerations, and therefore, community impacts, have been considered haphazardly, too late, and are continually trumped by economic interests.

Approving the Jackpine Mine Expansion Project would contribute significantly to multiple negative environmental impacts and would place further stress on vulnerable communities downstream. Yet the current regulatory structure is in no way capable of protecting Albertans, Canadians, or the environment from these impacts.

Approving this expansion would further entrench Alberta and Canada in an unsustainable development path. The country and province would be far better served by focusing on developing sustainable, environmentally sound energy alternatives.

Sincerely,

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