



CENTRAL ATHABASCA STEWARDSHIP SOCIETY

19 January 2015

Brett Maracle, Panel Manager
Canadian Environmental Assessment Agency,
160 Elgin St. 22nd floor,
Ottawa ON, K1A 0H3

Alberta Energy Regulator
Authorizations Review & Coordination Team
Suite 1000, 250 – 5 Street SW
Calgary, Alberta T2P 0R4

Re: Robb Trend Mine Proposal Public Consultation

Mr. Maracle and AER Staff,

The Central Athabasca Stewardship Society, among other groups of concerned citizens, has strived for years to promote improved planning and management of mining activities in the Athabasca River Basin, and yet we continue to see abysmally poor progress on the part of government and the mining industry in adopting more responsible public engagement, planning or operations practices.

In this particular case, we received information on these proceedings far too late to allow us to acquire sufficient information for meaningful participation. We can only assume that this was no accident, but rather an intentional strategy on the part of industry and government. Therefore, specific to this proposal and “public review” process we provide the following recommendations.

1. AER and CEAA must provide far broader, more transparent and more effective public engagement on this proposal before any approval can be considered.

2. AER and CEAA must review this proposal in the context of an already heavily impacted river basin, because we are long past the days when it may have been viewed by some industries as acceptable practice to inflict a degradation of this magnitude upon the landscape without considering the function and health of the entire interconnected watershed.

3. AER and CEAA must ensure provision of appropriate capacity for concerned basin residents to effectively participate in the review process, because public servants within these agencies are being paid to support citizens and the ecosystems that we depend on, however very few, if any, residents have ever seen any such support from public servants where mining has been involved.

4. AER and CEAA must ensure that a comprehensive cost / benefit analysis of the proposed project is performed by an unbiased, qualified third party and made readily available to the public. This analysis must carefully weigh the long term costs to Alberta's people in terms of lost ecosystem values, against the relatively short term corporate profits and miniscule royalties collected by the government. No project of this type or magnitude should ever be approved unless a there is a very clear, long term benefit to the public.

In summary, it is not acceptable that the Canadian and Alberta governments are complicit in driving ever accelerating cumulative degradation of the Athabasca River Basin. Scheduling a so called public consultation over the Christmas season is yet another example of the disrespect that governments have for basin residents and ecosystems. It is high time that both federal and provincial governments engage in more responsible planning and management of mining activities, and this proposal is as good a place as any to begin showing improvement!

Respectfully Submitted,
Donna Mendelsohn
Central Athabasca Stewardship Society

Cc:
Athabasca Bioregional Society
Keepers of the Athabasca
Concerned Citizens