



Canadian Ecumenical
Justice Initiatives /
Initiatives œcuméniques
canadiennes pour
la justice

Members

The Anglican Church of Canada
Canadian Catholic Organization for
Development and Peace
Canadian Religious Conference
Christian Reformed Church in
North America (Canada Corporation)
Evangelical Lutheran Church
in Canada
Mennonite Central Committee
Canada
The Presbyterian Church in Canada
The Primate's World Relief and
Development Fund
Religious Society of Friends (Quakers)
The United Church of Canada

Membres

Assemblée annuelle canadienne
de la Société religieuse des Amis
Comité Central Mennonite Canada
Conférence religieuse canadienne
Développement et Paix
L'Église anglicane du Canada
Église Évangélique Luthérienne
au Canada
L'Église presbytérienne au Canada
L'Église réformée chrétienne en
Amérique du Nord
(Société canadienne)
L'Église Unie du Canada
Le fonds du Primat pour le secours
et le développement mondial

310 Dupont Street, Suite 200
Toronto Ontario
Canada M5R 1V9
tel: 416.463.5312
toll-free: 1.877.403.8933
www.kairoscanada.org

May 25, 2021

Phase I Vista Test Underground Mine and Vista Mine Phase II Expansion Projects
Impact Assessment Agency of Canada – Prairie and Northern Regional Office
1145-9700 Jasper Avenue
Edmonton, Alberta T5J 4C3

To Whom it May Concern:

We are writing to express serious concerns about the Phase I Vista Test Underground Mine and Vista Mine Phase II Expansion Projects by Coalspur Mines (Operations) Limited. The proposed expansion would increase output by an average additional 4.2 million tonnes of coal each year. Considering Canada's environmental obligations and commitments in respect of climate change, and an assessment of the impacts on the rights of Indigenous peoples, **KAIROS Canada strongly recommends that this project undergo a full impact assessment.**

The proposed projects will adversely impact on the rights of Indigenous peoples and treaty rights of local First Nations.

Concerns have been raised by local First Nations, including the Louis Bull Tribe. The Tribe is signatory to Treaty No. 6 and the Vista Mine is in their traditional territory. In their May 2020 letter to the IAAC, the Tribe notes that "the mountains and the Eastern Slopes, where the Vista Mine is located, are sacred to Louis Bull."¹

Louis Bull holds Aboriginal and Treaty Rights recognized and affirmed under Section 35 of the Constitution. The Tribe outlined to IAAC, in May 2020, the ways in which the mine expansion would cause adverse effects on their Aboriginal and Treaty rights, including but not limited to their right to hunt, fish, trap and gather, and their right to carry out ceremonies in their traditional territories.²

A federal impact assessment is required to ensure the Government of Canada meets its commitment to a renewed relationship with Indigenous peoples that is based on the recognition of rights, respect, cooperation, and partnership.

The proposed projects would hinder the Government of Canada's ability to meet its climate change commitments.

In addition, the proposed projects are incompatible with pathways to limit global temperature rise to 1.5°C and Canada's targets to reduce greenhouse gas emissions by 46% by 2030. Coal is the single largest contributor to global temperature increase.³ According to Ecojustice, the total production of the proposed expanded mine could produce up to 33 million tonnes of carbon dioxide a year.⁴

On May 18, 2021, the IEA released a new report that clearly states that to align with the Paris Agreement and limit global warming to 1.5°C, there is no room for any additional thermal coal mines or expansions of existing mines.⁵ Therefore, the emissions from this



Canadian Ecumenical
Justice Initiatives /
Initiatives œcuméniques
canadiennes pour
la justice

Members

The Anglican Church of Canada
Canadian Catholic Organization for
Development and Peace
Canadian Religious Conference
Christian Reformed Church in
North America (Canada Corporation)
Evangelical Lutheran Church
in Canada
Mennonite Central Committee
Canada
The Presbyterian Church in Canada
The Primate's World Relief and
Development Fund
Religious Society of Friends (Quakers)
The United Church of Canada

Membres

Assemblée annuelle canadienne
de la Société religieuse des Amis
Comité Central Mennonite Canada
Conférence religieuse canadienne
Développement et Paix
L'Église anglicane du Canada
Église Évangélique Luthérienne
au Canada
L'Église presbytérienne au Canada
L'Église réformée chrétienne en
Amérique du Nord
(Société canadienne)
L'Église Unie du Canada
Le fonds du Primat pour le secours
et le développement mondial

310 Dupont Street, Suite 200
Toronto Ontario
Canada M5R 1V9
tel: 416.463.5312
toll-free: 1.877.403.8933
www.kairoscanada.org

proposed expansion, in whatever amount, are reason alone to cancel this project at this stage of the assessment phase.

Furthermore, the expansion of thermal coal extraction on Canadian soil is incompatible with Canada's commitment to the Powering Past Coal Alliance (PPCA). The primary use of thermal coal, which these projects would generate, is electricity generation. In March 2021, the PPCA held a global summit to boost international commitment and cooperation to shift away from coal power generation ahead of COP26. As co-chair of this alliance, Canada has an obligation and responsibility to accelerate the fossil fuel phase out of coal-fired power stations.

The proposed projects would hinder the Government of Canada's ability to meet its environmental obligations.

Populations of Rainbow Trout (Athabasca River populations) and Bull Trout (Saskatchewan-Nelson Rivers populations) can be found in rivers near the mine site. In 2019, both species were listed as endangered and threatened under Schedule 1 of the Species at Risk Act (SARA), respectively.⁶ SARA is a key tool for the conservation and protection of Canada's biological diversity and fulfils an important commitment under the United Nations Convention on Biological Diversity. Therefore, potential impacts to these species from the proposed projects must be examined by a federal impact assessment.

Concerns have also been raised that the expansion would further disrupt critical habitat for endangered caribou and bison herds. Adverse impacts on these species undermine rights of local First Nations who rely on them for food and cultural practices.

We strongly recommend that this project undergo a federal impact assessment and that the IAAC uphold its principles of sustainability, integrating science and Indigenous knowledge, and reconciliation and partnership with Indigenous peoples in the process.

Sincerely,

Beth Lorimer
Ecological Justice Program Coordinator
KAIROS: Canadian Ecumenical Justice Initiatives