



Honourable Jonathan Wilkinson MP
Minister of Environment and Climate Change
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Potential Regional Assessment of Coal Development and Exploration Activity in
Southwest Alberta
Impact Assessment Agency of Canada
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June 3, 2021

**Re: Submissions regarding the “Potential Regional Assessment of Coal
Development and Exploration Activity in Southwest Alberta” pursuant to s.
93(1) and s. 97(1) of the Impact Assessment Act**

Dear Minister Wilkinson and members of the Impact Assessment Agency of
Canada,

I write on behalf of the Yellowstone to Yukon Conservation Initiative (Y2Y)
regarding a Potential Regional Assessment of Coal Development and Exploration
Activity in Southwest Alberta pursuant to s.93(1) and s. 97(1) of the Impact
Assessment Act (Regional Assessment).

Y2Y’s mission is connecting and protecting habitat so people and nature can
thrive. Along with over 400 partners, Y2Y has worked for the past 25 years to
ensure that wildlife populations along the 3,200-kilometre length of the most
intact mountain ecosystem in the world remain connected, healthy and
genetically diverse. Our vision of an interconnected system of wild lands and
waters in the Yellowstone-to-Yukon region also aims to harmonize the needs of
people with those of nature by working to ensure development is consistent with
the long-term needs of wildlife species.



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On April 16, 2021, Minister Wilkinson instructed that the Impact Assessment Agency of Canada consider the March 22, 2021 presentation to the House of Commons of a “Petition to the Minister of Environment and Climate Change (No. 432-00681) as a formal request for a Regional Assessment pursuant to s. 97(1) of the *Impact Assessment Act*, SC 2019, c 28, s 1, and “to commence a review and analysis of it to inform [his] eventual decision on whether or not to conduct such a regional assessment.”

The petition was initiated on February 11, 2021 by Latasha Calf Robe, who is a principal of Niitsitapi Water Protectors (NWP), and by March 13, 2021, 18,333 Canadians had signed it in support.

We appreciate this opportunity to provide input on the scope of a Regional Assessment as a means of informing both the Impact Assessment Agency’s review and analysis, and the Minister’s decision on whether to conduct one.

The Rocky Mountains and Eastern Slopes in Alberta and the Elk Valley region in British Columbia are ecologically sensitive regions and function as the headwaters for many major river systems which flow across Canada and into the United States. Active and proposed metallurgical coal mining activities in the region have the potential to directly and irreversibly damage this critical area and contribute to growing cumulative impact concerns related to multiple coal exploration programs and proposed mine developments across the region.

RECOMMENDATIONS

Independent committee and general conceptual scope

We recommend that a committee of independent experts is created to conduct a Regional Assessment of the potential adverse effects (including and especially cumulative effects) of existing or future metallurgical coal mining activities. All phases of coal mine development that fall within federal jurisdiction should be considered, including exploration, development, transportation, reclamation, and end use of coal.

Geographic scope

We recommend that the geographical region of the Regional Assessment include the Rocky Mountains and the Eastern Slopes of southwest Alberta. Specifically, the Regional Assessment should examine all lands in the Rocky Mountains and the Eastern Slopes of southwest Alberta that are covered by the Alberta Government’s 1976 ‘Coal Development Policy’ that categorized those lands into Coal Categories 1-4.

The assessment area should also include Elk Valley in southeastern British Columbia, where similar large-scale metallurgical coal mine exploration and development is already happening, but on a much larger scale.

Variables to consider within analysis

We recommend that the Regional Assessment include an analysis of different scenarios regarding the pace and scale of future development of metallurgical coal mining in the region and include an analysis of the future global market for metallurgical coal.

Importantly, the Regional Assessment should explicitly consider the cumulative impacts of these activities on a) Indigenous peoples' rights to exercise their constitutionally-protected Treaty rights, b) at-risk trout and other aquatic species, especially pertaining to selenium pollution, c) critical habitat of terrestrial species at risk, d) greenhouse gas emissions, and e) transboundary impacts.

In closing, we support Canadian Parks and Wilderness Society – Southern Alberta Chapter, the Livingstone Landowners Group, and NWP's request for the Minister to order a 45-day extension of time to the information-gathering phase prior to making his decision on whether or not to order this Regional Assessment. This would allow for broader inclusion and participation from relevant stakeholders and First Nations in both Alberta and British Columbia.

Please do not hesitate to be in contact with us with any questions or requests for further information.

Your sincerely,

<Original signed by>

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Senior Alberta Program Manager

cc:

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