

ALBERTA ENERGY REGULATOR

PROCEEDING ID 449

IN THE MATTER OF the *Responsible Energy Development Act*, SA 2012, c R-17.3 ("**REDA**") and the Regulations and Rules made thereunder;

AND IN THE MATTER OF Application Nos. 1945552, 1945553, 001-00496728, 001-00496729, 001-00496730, 32212208, and 32900389 under the *Coal Conservation Act*, RSA 2000, c C-17 ("**CCA**"), the *Environmental Protection and Enhancement Act*, RSA 2000, c E-12 ("**EPEA**"), the *Water Act*, RSA 2000, c W-3 ("**Water Act**"), and the *Public Lands Act*, RSA 2000, c P-40 ("**PLA**"), and the Regulations made thereunder (collectively, the "**Applications**"), made by Summit Coal Inc. ("**Summit**").

MOTION OF SUMMIT COAL INC.

REPLY SUBMISSIONS

July 15, 2025

I. INTRODUCTION

1. On June 27, 2025, Summit filed a motion (the "**Motion**") pursuant to section 44 of the *Alberta Energy Regulator Rules of Practice* (the "**Rules**").¹ On July 3, 2025, the Municipal District of Greenview ("**Greenview**") filed comments in support of the Motion and on July 9, 2025, a response to the motion (the "**ENGO Response Submission**") was filed on behalf of the Alberta Wilderness Association ("**AWA**") and the Canadian Parks and Wilderness Society ("**CPAWS**") (collectively the "**ENGOS**").²

2. Summit's Motion requests that the Hearing Panel assigned to Alberta Energy Regulator ("**AER**") Proceeding 449:

- (a) immediately cancel the scheduled hearing dates and all other process steps set out in the Hearing Panel's letter of June 3, 2025;³ and
- (b) proceed to make a positive decision approving the Applications.

3. In this reply submission, Summit replies to the submissions made on behalf of the ENGOS. For the reasons set out below, Summit maintains that the hearing and all other process steps should be cancelled, and the AER should proceed to approve the Applications on a timely basis.

II. REPLY TO ENGO RESPONSE SUBMISSIONS

Legal framework

4. Summit's Motion, with detailed and specific references to the pertinent statutory provisions, established that the AER may, pursuant to the *Responsible Energy Development Act* ("**REDA**")⁴ and the *Rules*, cancel the hearing and proceed to decide on the Applications.

5. The ENGO Response Submission does not address these provisions or challenge Summit's interpretation of them. Instead, the ENGO Response Submission simply states that the principles of "natural justice, procedural fairness, reasonable expectation, and failure to consult" would be

¹ Alta Reg 99/2013 [*Rules*] and Exhibit 83.1.

² Exhibit 86.0.

³ Exhibit 69.0.

⁴ SA 2012, c R-17.3 [*REDA*].

engaged if the hearing were cancelled.⁵ This assertion is not elaborated upon, no supporting rationale for it is provided, and it is incorrect.

6. The content of procedural fairness, or natural justice, varies significantly depending on the context of each case.⁶ One important factor is the statutory framework, which in this case establishes that the AER has broad discretion to select its own procedures.⁷ There is no dispute that pursuant to the legislative framework, the AER is not required to hold a hearing in this case. Further, although the ENGOs are opposed to coal mining generally and therefore the Applications, the AER's decision is not important to them, in the sense that the decision will not impact on their liberty, property rights, or any other legal rights. Therefore, cancelling the hearing does not in any way offend the principles of natural justice or procedural fairness. In fact, cancelling the hearing is entirely consistent with these principles.

7. There is no basis upon which the ENGOs could have reasonably expected that a hearing would be held even if all the parties potentially directly and adversely affected by the Applications no longer objected to them being approved. First, the legislative framework does not support this expectation as it is focused on ensuring that the concerns of those who may be directly and adversely affected are considered, and if possible, addressed. AER hearings are not intended to be akin to public town halls where matters of policy are debated.

8. Second, as set out in the Motion, the potential cancellation of a hearing when certain parties withdraw from the process is a longstanding feature of the AER's regulatory regime. To wit, we are unaware of any hearing having been previously held where the only parties in opposition were the ENGOs.

9. Third, consistent with its past practice, the AER previously made it clear to all the parties in this Proceeding that the hearing may be cancelled if those parties who are potentially directly and adversely affected withdraw from the hearing: "If those withdrawals occur, we will address them when they occur."⁸ As set out by the Supreme Court of Canada, legitimate expectations arise with respect to certain procedural safeguards when a tribunal makes representations that are "clear,

⁵ Exhibit 86.0, PDF 3.

⁶ *Landry v Rocky View County (Subdivision and Development Appeal Board)*, 2025 ABCA 34, at para. 33.

⁷ *Alta Link Management Ltd v. Alberta Utilities Commission*, 2023 ABCA 325, at para. 50 and REDA at s. 61(w).

⁸ Exhibit 53.0 at PDF p. 2.

unambiguous, and unqualified".⁹ In this case, the parties were expressly advised that the hearing may be cancelled if certain parties withdraw from the Proceeding.

10. With respect to the failure to consult, this is a concept typically raised in the context of Indigenous communities, and it has no application in the current circumstances, since all Indigenous communities have confirmed they either support or don't object to the timely approval of the Applications.

11. Therefore, there are no legal impediments to the AER cancelling the hearing and proceeding to decide on the Applications, as requested in the Motion. Doing so is entirely consistent with the statutory regime governing the AER.

The ENGOs have nothing constructive to offer

12. A significant portion of the ENGO Response Submission takes issue with statements contained in the Motion regarding the ENGO's views on natural resource development. However, regardless of whether the ENGOs support certain types of development, this is irrelevant to whether the hearing should be cancelled.

13. The hearing should be cancelled because the ENGOs have no potential to be directly and adversely by the AER's decision on the Applications. The ENGOs' support of energy storage, solar, wind, and other types of developments is irrelevant. Moreover, it is worth noting that all these developments require the use of steel, the reliable supply of which requires access to high-quality metallurgical coal from developments like Mine 14. Despite this, the ENGOs are adamantly opposed to any coal mining whatsoever.

14. The ENGOs' fervent opposition is again demonstrated in the ENGO Response Submission where they make generalized policy assertions that are irrelevant to the Applications before the AER. They argue that the AER must have regard to the fact that Alberta communities need support to ensure their sustainability as Alberta transitions from coal. This is absurd. There is no plan to transition away from the production of metallurgical coal. Metallurgical coal remains critical to the production of steel, one of the world's most important construction materials. There are no

⁹ *Canada (Attorney General) v. Mavi*, 2011 SCC 30, at para. 68.

federal or provincial policies that contemplate a reduction of steel use or metallurgical coal production. The ENGOs' assertion that there is a transition from metallurgical coal is not credible and demonstrates an unhelpful and dangerous bias on the part of the ENGOs

15. The ENGO Response Submission demonstrates that the ENGOs are incapable of understanding the scope of the Proceeding. They refer to thermal coal developments, raise issues regarding existing abandoned mines, and obligations of the federal government. None of these issues are relevant in this Proceeding.

16. Finally, while the ENGOs maintain that Summit has misrepresented their views, they fail to refute the fact that when it comes to coal mining, they are adamantly opposed to any coal mining whatsoever. The AWA's *Day of Action Against Coal in the Eastern Slopes*,¹⁰ confirms this is the case. The AWA states that "All coal mining and exploration threatens the health of our Eastern Slopes" and that existing operations "must be phased out". The AWA's views are categorical and made without any regard to the economic or geopolitical consequences of ceasing to produce a globally sought after product, and in many jurisdictions including the United States and Europe, a recognized critical mineral of strategic importance. No exceptions are made for responsible developments.

17. CPAWS also advocates against any coal development whatsoever. It highlights public protests opposing coal and misrepresents Albertan's views on the subject.¹¹ CPAWS states that "[...] the results of the 2021 Coal Policy public engagement, which showed 70% of Albertans oppose any new coal exploration or mine development anywhere in the province." This is false. The correct information is: "The majority of respondents felt that the management of Alberta's coal resources affected them, with more than 70 per cent indicating it had a major effect on them."¹²

¹⁰ See <https://albertawilderness.ca/act-now/awas-day-of-action-against-coal/>, and Exhibit A to the Affidavit of Eva Lew.

¹¹ See <https://action.cpaws.org/page/164552/action/1>, and Exhibit B to the Affidavit of Eva Lew.

¹² <https://open.alberta.ca/dataset/5859a1b2-14a3-4a2d-bf36-38956efb68b4/resource/d3f4cab6-2fac-4712-95ad-fd6eb7a7b503/download/energy-coal-policy-engagement-survey-results-2021-05.pdf>, and Exhibit C to the Affidavit of Eva Lew

18. Furthermore, "Approximately 30 per cent of respondents felt exploration and development may be appropriate for some areas of the province" and this includes "Lands in Categories 3 and 4".¹³

19. In any event, it should be noted that only 25,000 people responded to the Coal Policy Engagement Survey. Assuming all these responses were from Albertans and that individuals did not submit more than one response, this represents only 0.5% of Alberta's population. Accordingly, while we refer to the survey results to demonstrate that CPAWS has misrepresented the results, our view is the AER should give no consideration to the results.

20. In conclusion, the ENGOs have the right to advocate against coal mining in public forums including by way of publishing websites, organizing public protests outside the AER's offices, and coordinating the submission of form letters to government officials. However, they do not have a right to require that the AER and Summit expend significant financial resources to hold a public hearing to facilitate their advocacy. The AER's hearing process was never intended to be abused in this way. Instead, the AER's hearing process is intended to be a technical review focused on the specific development application before it.

The ENGOs have no connection to the area

21. The ENGO Response Submission states that "Both organizations have membership in the thousands, representing people all across Alberta, including members who visit, work, live, and raise families in the Grand Cache Area [*sic*]." Based on the record of this Proceeding, this is false.

22. Residents and Indigenous groups residing in and around Grande Cache have repeatedly made it clear that they support the timely approval of the Applications.¹⁴ There is no evidence of any local community members with the potential to be directly and adversely affected being opposed to the AER approving the Applications. In fact, those with the potential to be directly and adversely affected have repeatedly requested that the Applications be approved as soon as possible.

23. Valory Resources Inc., the owner of Summit, has maintained an office in Grande Cache for 2 years. Local residents, including members of Indigenous communities, have visited the office

¹³ *Ibid.*

¹⁴ See Exhibits 78.0, 79.0 and 85.0.

to discuss the Applications and Summit's development plans. However, during this time, no one from the AWA or CPAWS has attended the office to obtain information or clarification regarding the Applications. This further corroborates that the ENGOs have no local connection to the area.

The ENGOs hearing submissions do not raise any valid issues

24. The ENGOs submit that their hearing submissions raise valid issues that must be considered by the AER and refer to baseline data, assessments related to wildlife and biodiversity and other issues. However, the ENGO Response Submission fails to provide any justification for this position. Summit complied with all the regulatory filing requirements. The fact is that the Applications would not have been referred to a public hearing had they not been first deemed complete. Consistent with this, the ENGO Response Submission fails to point to any specific regulatory requirement that has not been complied with and instead only makes generalized high-level statements in the short four paragraphs dedicated to this issue.

25. Summit maintains that neither AWA nor CPAWS have put forward any material, relevant, or substantive arguments which raise any question as to whether the Applications should be approved.

III. RELIEF REQUESTED

26. Based on the foregoing, Summit respectfully requests that the Hearing Panel:

- (a) immediately cancel the scheduled hearing dates and all other process steps set out in the AER's letter of June 3, 2025 pursuant to subsection 34(1) of the *REDA*;
- (b) proceed to make a positive decision approving the Applications; and
- (c) grant any such further and other relief as the Hearing Panel deems appropriate.

All of which is respectfully submitted this 15th day of July, 2025.

ALBERTA ENERGY REGULATOR

PROCEEDING 449

IN THE MATTER OF the *Responsible Energy Development Act*, SA 2012, c R-17.3 ("**REDA**") and the Regulations and Rules made thereunder;

AND IN THE MATTER OF Application Nos. 1945552, 1945553, 001-00496728, 001-00496729, 001-00496730, 32212208, and 32900389 under the *Coal Conservation Act*, RSA 2000, c C-17 ("**CCA**"), the Environmental Protection and Enhancement Act, RSA 2000, c E-12 ("**EPEA**"), the *Water Act*, RSA 2000, c W-3 ("**Water Act**"), and the *Public Lands Act*, RSA 2000, c P-40 ("**PLA**"), and the Regulations made thereunder (collectively, the "**Applications**"), made by Summit Coal Inc. ("**Summit**").

AFFIDAVIT OF EVA LEW

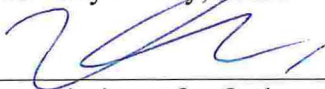
Sworn on July 15, 2025

I, EVA LEW, of the City of Calgary, in the Province of Alberta, MAKE OATH AND SAY AS FOLLOWS:

1. I am employed as a legal assistant by Bennett Jones Services Limited Partnership, a services limited partnership for Bennett Jones LLP, solicitors for the Applicant, Summit, and as such, I have personal knowledge of the matters hereinafter deposed to me, or I am informed of and verily believe them to be true.
2. I make this affidavit in support of a reply submission filed by Summit pursuant to section 44 of the *Alberta Energy Regulator Rules of Practice*, Alta Reg 99/2013.
3. Summit has filed the above-noted Applications with the Alberta Energy Regulator ("**AER**") which are currently subject to a public hearing process designated as AER Proceeding 449.

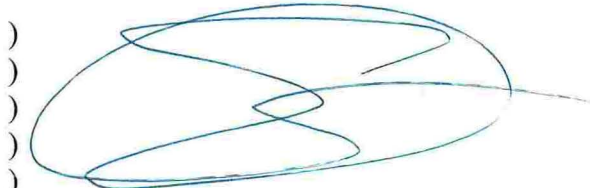
4. The record for Proceeding 449, including the Applications, is publicly available via the AER's Public Record System and can be accessed at the following internet address: <https://apps.public.aer.ca/hearing/proceeding/449>.
5. The Alberta Wilderness Association ("AWA") and the Canadian Parks and Wilderness Society ("CPAWS") oppose Summit's Applications and have each been granted standing as "Full Participants" in Proceeding 449.
6. On July 15, 2025, I accessed AWA's publicly available website at <https://albertawilderness.ca/act-now/awas-day-of-action-against-coal/> and downloaded an excerpt of the displayed webpage, a copy of which is attached as **Exhibit "A"**.
7. On July 15, 2025, I accessed CPAWS' publicly available website at <https://action.cpaaws.org/page/164552/action/1> and downloaded an excerpt of the displayed webpage, a copy of which is attached as **Exhibit "B"**.
8. On July 15, 2025, I accessed the Government of Alberta's publicly available website at <https://open.alberta.ca/dataset/5859a1b2-14a3-4a2d-bf36-38956efb68b4/resource/d3f4cab6-2fac-4712-95ad-fd6eb7a7b503/download/energy-coal-policy-engagement-survey-results-2021-05.pdf> and downloaded the Energy Coal Policy Engagement survey results as **Exhibit "C"**.

SWORN BEFORE ME at the City of
Calgary, in the Province of Alberta,
this 15th day of July, 2025.



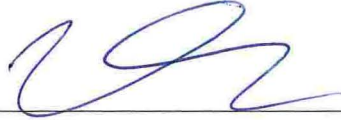
A Commissioner for Oaths
in and for Alberta

Zachary Thomas
Student-at-Law



EVA LEW

This is **Exhibit "A"** referred to in the
Affidavit of **Eva Lew**
Sworn before me, this 15th day of July, 2025

A handwritten signature in blue ink, appearing to read 'ZT', is written above a horizontal line.

Commissioner for Oaths in and for Alberta

Zachary Thomas
Student-at-Law

AWA's Day of Action Against Coal in the Eastern Slopes

albertawilderness.ca/act-now/awas-day-of-action-against-coal/



SAY NO TO COAL

*AWA's Day of Action Against
Coal in the Eastern Slopes*

WHAT: A phone call blitz to the Alberta government.

WHEN: Feb. 10, 2025

WHY: The government hasn't listened to Albertans. We must get LOUD and ensure "no to coal" is the only thing they hear about.

WHAT'S THE PLAN?

On this Day of Action, we need you to call:

- Brian Jean, the Minister of Energy and Minerals (780) 427-3740.
- Rebecca Schulz, the Minister of Environment and Protected Areas (780) 427-2391.
- Your MLA.
- Any other government official you want.
- Encourage everyone and anyone who might be interested to do the same.

Tell them that:

- The Eastern Slopes and our headwaters are the lifeblood of Alberta's wilderness and communities.
- All coal mining and exploration threatens the health of our Eastern Slopes.
- The ban on coal development in the Eastern Slopes must be immediately restored and made permanent.
- Existing operations must be phased out and operators held responsible to timely and stringent reclamation requirements.
- The government must address the legacy of un-reclaimed liabilities on the landscape, including old mines and exploration roads.
- The government must prioritize and protect the integrity and long-term health of Alberta's environment, which provides essential and irreplaceable ecosystem services and benefits.

HOW DOES THIS HELP?

Calling puts Albertans' concerns on the record; a paper-trail of evidence that the public spoke up.

WHY JUST ONE DAY?

By concentrating this action on one day, it builds critical mass, keeping their phone lines busy and demanding they expend time and energy focused on this issue.





**SAY NO
TO COAL**

Common Arguments and their Rebuttals

Alberta is banning mountain-top mining. There will be no open-pit mines in the Eastern Slopes.

Alberta is still planning to permit surface mining in the form of strip mines, as well as underground mines. Just because they won't be located at the very top of mountains (coal deposits are not found here anyways) they are still associated with the same threats.

Alberta has the most stringent environmental regulations in the world.

Alberta's regulatory system regularly permits the destruction and degradation to the environment at the expense of the public. Examples include the Obed coal mine failure, the multiple coal wastewater incidents at existing and legacy coal operations in 2022 and 2023, Imperial Oil's Kearsy leak and subsequent spill, and more. Issues within the regulatory and compliance system are well documented by both the [Auditor General](#) and [independent research](#).

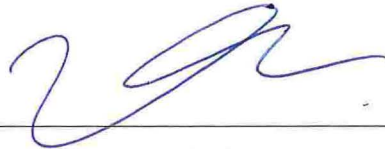
Industry will ensure that no selenium gets into the water through enhanced monitoring and new technologies.

This promise is incredibly disingenuous, as they can neither keep it or back it with evidence. No technology exists to prevent 100% of selenium, along with antimony, cobalt, lithium, manganese, molybdenum, nickel, strontium, thallium, uranium and the many other pollutants associated with coal mining from entering the environment. Without 100% efficacy, they accumulate to harmful effects. Further, monitoring is not a substitute for protection, particularly when the results of monitoring don't result in meaningful changes to companies' procedures or fines/charges for non-compliance.

It will be good for the economy/ is diversifying the economy.

At best, current and proposed mining operations are projected to break-even for private investors, creating only marginal tax revenues and opportunities by way of employment for people in the region. These minimal boons are significantly outweighed by the substantial and adverse impacts to water, wildlife, vegetation, air, and human health. Mining this region will also interfere with the Land, rights, and sovereignty of Indigenous Peoples.

This is **Exhibit "B"** referred to in the
Affidavit of **Eva Lew**
Sworn before me, this 15th day of July, 2025

A handwritten signature in blue ink, appearing to read 'Zachary Thomas', written over a horizontal line.

Commissioner for Oaths in and for Alberta

Zachary Thomas
Student-at-Law



The Biggest Coal Risk to Date: New Coal Policy Direction in Opposition to Albertans' Values

Government of Alberta **MUST** develop a coal policy that protects Albertans and our Future

Over the past five years, Albertans have been loud and clear that they oppose ANY new coal exploration or mining in Alberta's Rocky Mountains and Eastern Slopes. Tens of thousands came together for a collective, concerted push against the Government of Alberta's rescission of the 1976 Coal Policy and the subsequent mine exploration, which was successful in forcing the province to implement a moratorium in 2022.

Unfortunately, all of that once more changed December 20, 2024 announcement of a new coal policy direction — the [Alberta Coal Industry Modernization Initiative](#) (CIMI) — and the January 20, 2025 announcement that the Minister of Energy and Minerals has rescinded the moratorium on coal mining in the Eastern Slopes and confirms the [1976 A Coal Policy for Alberta](#).

More than 50 organizations, municipalities, and businesses signed on to community-led [A Coal Policy for Alberta – 2022 and Beyond](#) based on publicly available feedback submitted to the Coal Policy Committee. It provides a clear path forward to the end of coal in Alberta.

Instead, hundreds of thousands of hectares of NEW coal exploration and development could commence THIS spring. It also means that an application for the Grassy Mountain Mine could be approved at any time — it no longer "matters" whether it's an advanced project or not.

The Coal Industry Modernization Initiative (CIMI) may be the greatest risk to Alberta's Rocky Mountains and Eastern Slopes to date. This new direction on an Alberta coal policy:

- [Reopens almost 188,000 hectares of coal leases](#) on the Eastern Slopes of the Rockies to new coal exploration and damaging surface and underground mining, including Cabin Ridge in Southern Alberta and the Blackstone Mines in the Bighorn Backcountry.
 - Puts our water and communities at risk by relying on industry promises of technologies that have never been proven to work on the scale of an operating mine.
 - Disregards the results of the 2021 Coal Policy public engagement, which showed 70% of Albertans oppose any new coal exploration or mine development anywhere in the province.
 - Ignores the recommendations of the independent [Coal Policy Committee](#) that any new direction on coal should be preceded by land-use planning.
-

Why are the Eastern Slopes so important?

The [impacts of coal mining](#) are far-reaching and long-term. They include:

- Putting our headwaters, watersheds, and drinking water at risk by leaching contaminants such as selenium and other pollutants into streams and rivers. No operating technology has successfully prevented these releases at levels safe for aquatic ecosystems.
- Exploration and development of coal mines destroys habitat for sensitive wildlife including mountain goats, caribou, grizzly bears, and native trout, and sensitive alpine vegetation.
- Using large quantities of water reducing the amount available for fish, communities, and agriculture.
- Producing dust containing harmful compounds such as arsenic, which causes respiratory and cardiovascular impacts and contaminates the soil that supports agriculture, livestock, and ecosystem function.
- Hiking, camping, fishing and other recreation/tourism is inhibited near heavy industrial activity such as open pit and other mining activity, impeding development of sustainable economies.

The below letter is an URGENT ask to your MLA, the Minister of Energy and Minerals, and the Premier to push for greater protection in the Rocky Mountains and Eastern Slopes and create a policy to keep the region safe from all new coal mining.

Write Your Letter

Canadian Parks and Wilderness Society Northern
Alberta Chapter | P.O. Box 52031 | Edmonton, Alberta
| T6G 2T5 | (780) 328-3780

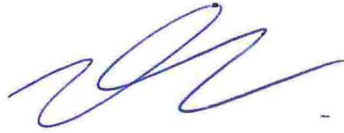
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CPAWS is a registered charity, #10686 5272 RR0001

Canadian Parks and Wilderness Society Southern
Alberta Chapter | 105 12th Avenue SE, Suite 310 |
Calgary, AB T2G 1A1

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This is **Exhibit "C"** referred to in the
Affidavit of **Eva Lew**
Sworn before me, this 15th day of July, 2025



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Zachary Thomas
Student-at-Law

Coal Policy Engagement

Initial engagement survey results

As a first step in the Coal Policy Engagement process, an initial survey opened on March 29 and closed on April 19, 2021. The survey results will help inform the Coal Policy Committee's engagement activities. The committee is responsible for ensuring all Albertans have the opportunity to be involved in the engagement process.

There was a high level of interest in the survey, with almost 25,000 responses. Responses came from across the province, with the majority from southern and central Alberta. Responses were also received from all age groups.

RESPONSES BY REGION

Region	Responses
Central	8,807
Northeast	403
Northwest	589
South	13,829
N/A	1,124
Total	24,752

RESPONSES BY AGE GROUP

Age group	Responses
Under 18	113
18-24	1,051
25-34	4,526
35-44	5,462
45-54	3,844
55-64	4,423
Over 65	3,794
Prefer not to say	1,212
Total	24,425

Summary

- The majority of respondents feel the management of the province's coal resources affect them.
- "Environmental impacts of coal development" and "if and where coal development takes place" were ranked by respondents as the most important issues when discussing Alberta's coal policy.
- The majority of respondents feel that there are areas of the province that are not appropriate for coal development, while almost one-third of respondents say that there are areas of the province where development could be appropriate.
- Albertans would like to participate in the engagement process through additional online surveys and virtual meetings.
- Respondents want to learn more about the approval processes for exploration and development, as well as the coal categories, which dictate where and how coal leasing, exploration and development can occur.
- The majority of respondents expressed concerns about coal exploration and development.

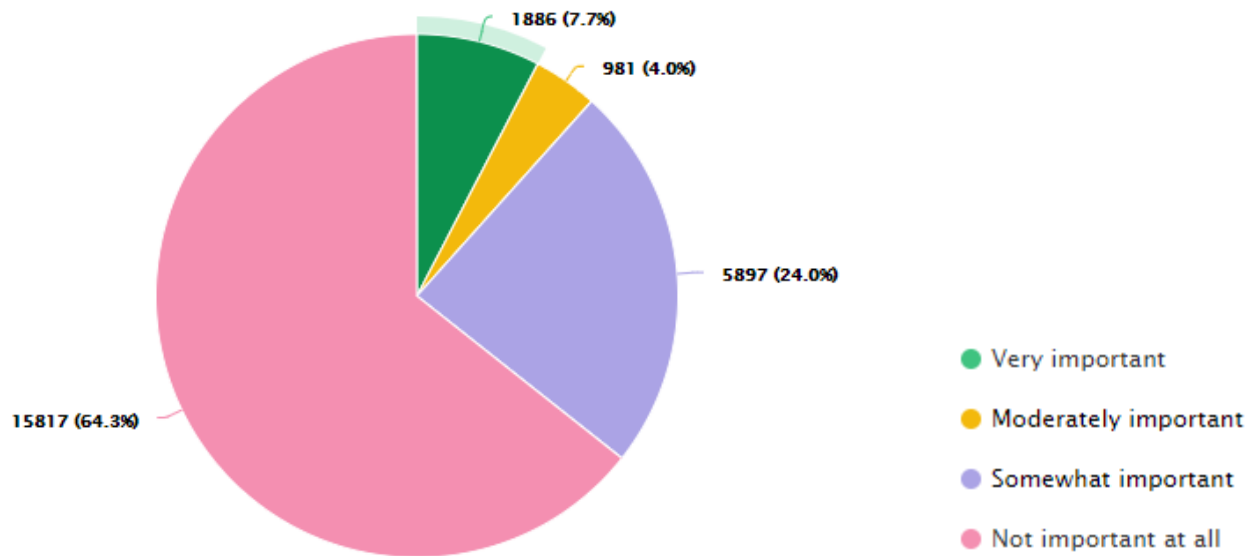
Impacts of coal development

The majority of respondents felt that the management of Alberta’s coal resources affected them, with more than 70 per cent indicating it had a major effect on them.

Respondents described effects such as coal mining impacts on water, air, environment, health, wildlife and their ability to enjoy outdoor activities. They also expressed concern about liability for clean-up and contamination, and the impact of this on future generations.

When asked how important they felt the economic benefits of coal development are to Alberta and its communities, 64 per cent of respondents felt it was not important at all.

How important do you think the economic benefits of coal development are to Alberta and its communities?



Familiarity with Alberta’s coal sector

Respondents indicated they are informed about Alberta’s coal sector. Many respondents indicated that they are familiar with the 1976 Coal Policy and coal categories, with 26 per cent “very familiar” and 56 per cent “somewhat familiar.” In general, respondents also felt familiar with coal exploration and development in Alberta. The majority of respondents indicated they were also familiar with the uses of metallurgical and thermal coal.

HOW FAMILIAR ARE YOU WITH...

(in per cent)

	1976 Coal Policy	Coal categories	Coal exploration	Coal development
I don’t know	1	1	0	0
Not at all familiar	5	4	2	2
Not very familiar	13	13	11	10
Somewhat familiar	56	50	58	59
Very Familiar	26	31	29	29

Issues related to Alberta's coal policy

Respondents are concerned about regulation of coal exploration and development. More than 85 per cent indicated they were not at all confident that coal exploration/development in Alberta is regulated to ensure it is safe, efficient, orderly, and environmentally responsible.

More than 90 per cent of respondents felt there are areas of the province that are not appropriate for coal exploration and development. Suggestions for restricted areas include:

- The Rockies and the foothills
- Wildlife corridors
- Areas near watersheds or major bodies of water
- Lands in Categories 1, 2 and 3
- Recreational areas
- Ecologically sensitive areas
- Areas in close proximity to residential areas
- Areas in close proximity to farms

There were also suggestions that no areas of the province are appropriate for coal exploration and development.

Approximately 30 per cent of respondents felt exploration and development may be appropriate for some areas of the province. Suggestions for appropriate areas include:

- Lands in Categories 3 and 4
- Areas not in proximity to a watershed
- Existing mine sites
- Areas that do not affect First Nations lands/Métis settlements
- Lands that have no other use
- Areas not prone to drought
- Northern areas with low population
- Only areas with metallurgical coal

Respondents ranked a series of options to indicate what they considered most important when discussing Alberta's coal policy. Of highest importance were the environmental impacts of coal development, followed by if and where coal development takes place. Regulatory oversight, enforcement and approval processes were also highly ranked.

MOST IMPORTANT ISSUES WHEN DISCUSSING ALBERTA'S COAL POLICY

(from most important to least important)

Issue	Ranked score
Environmental impacts of coal development	1.97
If and where coal development takes place in Alberta (e.g. coal categories)	2.99
Regulatory oversight and enforcement for coal exploration	4.42
Approval processes for coal exploration	4.54
Regulatory oversight and enforcement for coal development	4.65
Approval processes for coal development	4.9
Providing an understanding of local and economic community impacts	5.47
Economic impacts of coal development	6.49

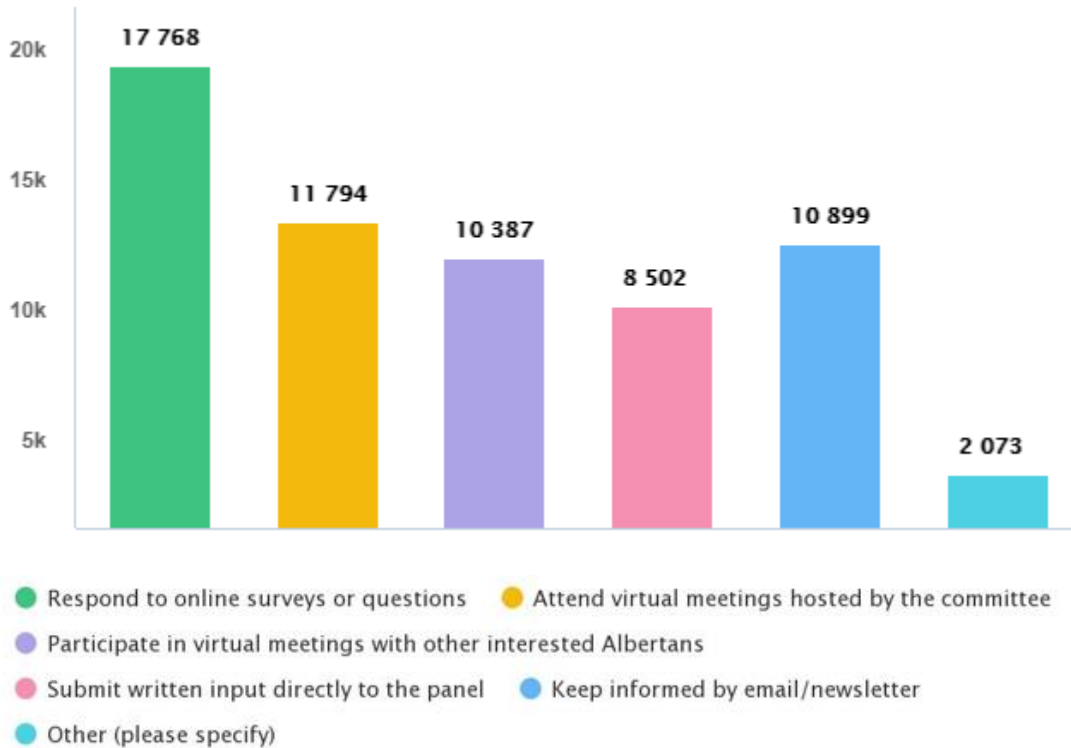
Respondents provided many suggestions on other important issues that should be discussed. The most common suggestions related to the impacts of coal development on water. Other issues included:

- Whether any surface development should be allowed
- Intergenerational issues such as industry sustainability, long-lasting contamination concerns and health impacts
- Future liability for clean-up and reclamation

Engaging with the Coal Policy Committee

Respondents were interested in several options to continue to engage with the committee, including a subsequent survey, participation in virtual meetings, and providing input directly to the committee.

How would you like to engage with the committee during this engagement?



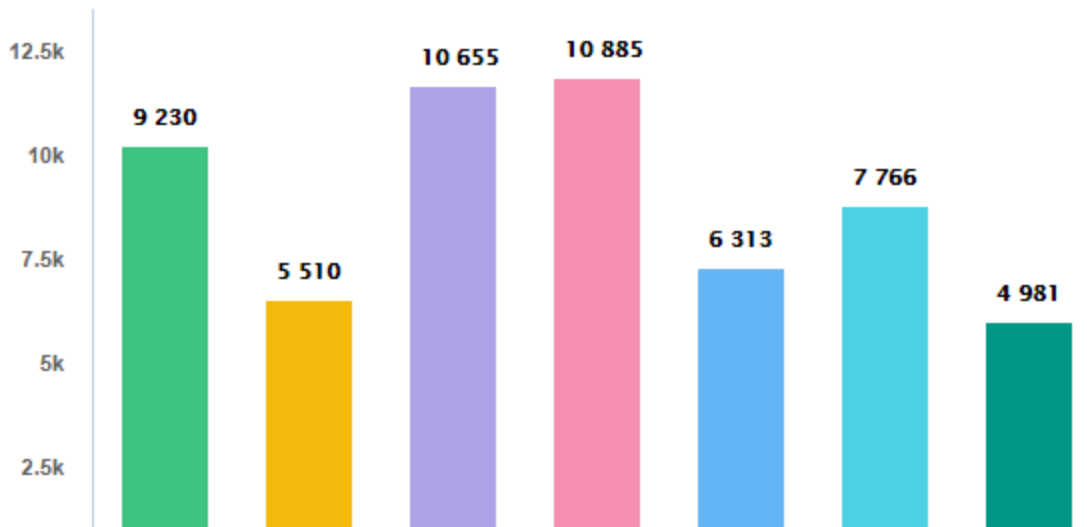
Suggestions on ways to engage with the Coal Policy Committee include:

- Town halls
- Public hearings
- Posting written submissions online

Topics of interest

Respondents identified a number of topics they would like to become more familiar with to support their participation in the engagement process. Most commonly mentioned were the approval processes for coal exploration and development, followed closely by the coal categories.

Aspects of the 1976 Coal Policy or regulation of coal development that respondents want to become more familiar with before participating in future engagement.



- Coal categories which define where and how coal exploration and development can occur
- Coal leasing
- Approval processes for coal exploration
- Approval processes for coal development (e.g. mines)
- Coal royalties
- Existing coal mines in Alberta
- Other (please specify)