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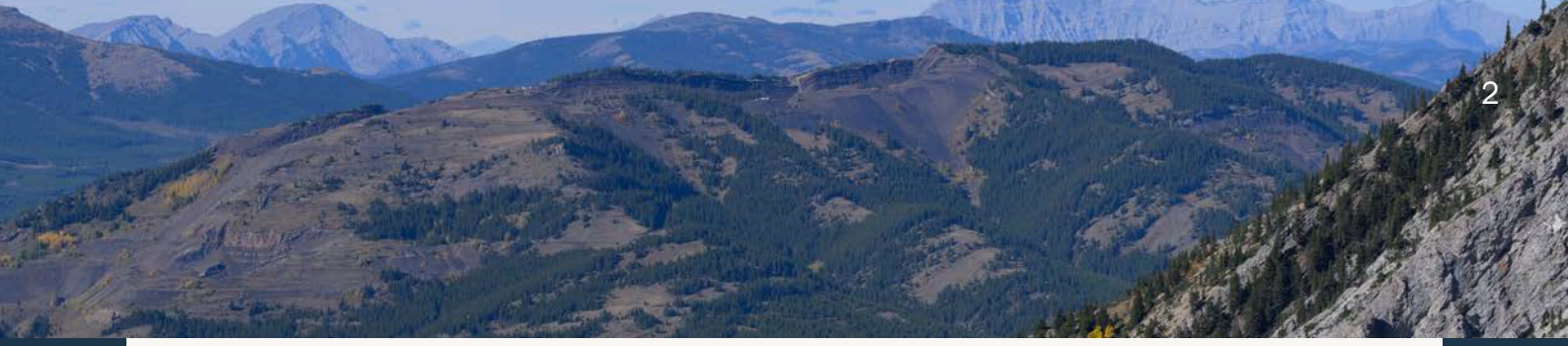
Exposed coal seams at the Grande Cache Coal Mine near Grande Cache, Alberta. Photo by C. Campbell.

Coal Policy Development in Alberta's Eastern Slopes

Guide to Assessing Impacts to our Communities, Economy, and Environment

In December 2024, the Minister of Energy and Minerals announced a new policy direction for coal, the **Coal Industry Modernization Initiative (CIMI)**. CIMI is still in development and Alberta MLAs play an important role in evaluating the proposed policy and ensuring it reflects public input, provides regulatory certainty, protects Alberta's air quality and water security, protects taxpayers, and supports sustainable economic development.

This document provides key considerations to evaluate CIMI based on an evidence-based overview of coal development in Alberta's Eastern Slopes and identifies key **policy considerations for legislators** as the Ministry of Energy and Minerals advances CIMI. It draws on publicly available research, government reports, economic analyses, and recommendations from the Coal Policy Committee, and recognizes the greater importance of the Eastern Slopes to water security, agriculture, municipalities, recreation, tourism, and downstream communities.



Key Considerations for MLAs

As representatives entrusted with protecting Alberta's economy, water security, fiscal interests, and the long-term prosperity of the province, MLAs should not support a CIMI policy that fails to provide clear, durable, and enforceable safeguards for Alberta's Eastern Slopes.

We recommend that MLAs:

- **Support an immediate moratorium on all new coal exploration and development**, including new applications, until an updated coal policy and legislation is completed.

- **Communicate constituent concerns** directly to Cabinet, relevant Ministers, caucus colleagues, and legislative committees responsible for the development of CIMI and related legislation.

- Ask the Ministry of Energy and Minerals to ensure there are meaningful **opportunities for public consultation on any new policy framework.**

- **Ensure the policy:**
  - Enacts legislation that **permanently prohibits new coal development** and provides the certainty sought by communities, municipalities, landowners, and investors regarding the future of coal development. Temporary policies, ministerial orders, and regulatory decisions are insufficient to create long-term certainty and stability.
  - Includes regulations that **protect Alberta's water resources** through enforceable and stringent standards that prevent the release of mining contaminants.
  - Applies a **conservative approach** where scientific or technological uncertainty remains regarding long-term water impacts, reclamation success, and perpetual treatment obligations.
  - **Protects taxpayers** by ensuring Alberta does not assume future liabilities associated with mine reclamation, long-term water treatment, or abandoned mine obligations.

A Guide to Evaluate CIMI
Background

Background

The question facing Alberta is no longer where coal development can occur in the Eastern Slopes. The question is whether the province is prepared to accept the long-term impacts and economic risks that accompany it across this invaluable landscape.

- Albertans across the political spectrum have expressed significant concern regarding coal development in the Eastern Slopes and protection of Alberta's headwaters. Public consultation on any new policy will be key in creating trust.

- Water security remains one of Alberta's most important economic and public policy priorities, particularly for municipalities, agriculture, Indigenous communities, industry, and downstream users.

Existing evidence demonstrates that all forms of coal mining, including underground mining, affect water quality, air quality, and surrounding landscapes.

Current technologies cannot fully resolve release and leaching of pollutants, such as selenium and other mining contaminants, at safe levels. There are no legally enforceable limits in Alberta on the release of coal mining contaminants, including selenium.



In 2022, researchers with the Government of Alberta found that coal dust from the mines in BC's Elk Valley was blowing over the Rockies and polluting Window Mountain Lake (pictured here) in Alberta. Photo by. K. Halvorson.

A Guide to Evaluate CIMI
Background

Background

- Coal exploration and development projects are moving forward in the absence of clear policy that provides certainty and protects Albertans' interests.
- Regulatory certainty is important for communities, investors, municipalities, and resource industries alike.
- Global steelmaking markets are evolving, raising questions about the long-term economic viability of new metallurgical coal developments.
- Long-term reclamation and water treatment obligations may create financial risks that should not be transferred to Alberta taxpayers.



As the Ministry of Energy and Minerals finalizes CIMI, MLAs have an opportunity to help ensure the resulting policy provides opportunity for public input, regulatory certainty, protects taxpayers, safeguards clean air and water, and reflects the priorities expressed by Albertans.

This guide gives additional background and guidance on how to evaluate CIMI.

The Coal Policy Committee and Albertans' Perspectives

In 2021, the Government of Alberta established the Coal Policy Committee to engage Albertans on the future of coal development and management. The committee's engagement process included municipalities, Indigenous communities, landowners, agricultural producers, environmental organizations, businesses, and industry representatives.

Among the most common themes identified through this engagement were:

- Protection of Alberta's Eastern Slopes and headwaters;
- Stronger water monitoring and management;
- Consideration of cumulative environmental effects;
- Greater certainty regarding future coal development; and
- Improved engagement with Indigenous communities and rights holders.

The committee's chair noted that polling and departmental surveys indicated substantial public opposition to expanding any coal mining in the Eastern Slopes. A new policy framework should not be approved without full public consultation to ensure Albertans voices are accurately reflected.



Un-reclaimed mines from operations long closed continue to scar Alberta's Eastern Slopes and are liabilities on the landscape. Photo by C. Hunter.

The Coal Industry Modernization Initiative (CIMI)

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If the Coal Industry Modernization Initiative is to deliver on its promise of modernization, it should culminate in legislation that provides permanent protection for Alberta's Eastern Slopes by prohibiting new coal exploration, development, and mining in the region. Project by project regulatory processes do not provide the necessary certainty and will only extend provincial tensions related to coal development.

However, current indications are that the policy will allow more coal development in the Eastern Slopes, including surface mining, and rely on either untested or completely unsubstantiated claims that this development can occur without contaminating the air and water sources for millions of Albertans.

Given the significance of Alberta's Eastern Slopes as a source of drinking water, irrigation water, recreation opportunities, agricultural productivity, and fish and wildlife habitat, CIMI presents an opportunity to provide clear policy direction that addresses economic development, environmental stewardship, and long-term fiscal responsibility.

As the CIMI process has progressed, the Ministry of Energy and Mineral's stated commitments regarding coal development in the Eastern Slopes appear to have become less definitive. When CIMI was first announced, the Ministry committed to prohibiting new open-pit coal mining in Alberta's foothills and Rocky Mountains. More recent descriptions indicate that both surface and underground mining may be permitted.



Adanac No. 1, pictured here, is an old strip mine immediately adjacent to Castle Provincial Park. Never remediated, its coal seams remain exposed to the environment and pose a risk to downstream and downwind ecosystems. Photo by L. Wallis.

Even though underground mining is often described as having a smaller footprint than surface mining, this footprint is not negligible. It can still alter groundwater flow, cause surface disruptions, impact streams and wetlands, and release contaminants.

This shift raises important questions about whether CIMI will ultimately provide the certainty and protections Albertans were promised.

At the same time, approvals for additional coal exploration and mines have continued within the Eastern Slopes while the policy framework remains under development. If the government's objective is to provide certainty for communities, municipalities, investors, and landowners, CIMI should clearly establish which activities will be permanently prohibited and ensure that those protections are enshrined in legislation rather than subject to future interpretation or policy change.

Without permanent legislative protections, future governments, regulators, and the public will continually revisit these questions, perpetuating uncertainty and undermining confidence in the province's approach to managing Alberta's resources.



Left unaddressed, mines like Adanac degrade both the environment and recreation experiences. Photo by K. Halvorson.

A Moratorium Protects Albertans

Until a new coal policy framework is finalized and enacted through legislation, decisions made today are effectively predetermining outcomes that Albertans have not yet had an opportunity to evaluate or discuss.

A temporary moratorium on new coal exploration, development approvals, and permitting activity in the Eastern Slopes would help ensure that policy development occurs in an orderly and transparent manner. It would allow government to complete consultation with Albertans and establish a durable legislative framework before additional development rights or approvals are granted.

A temporary pause would ensure that decisions about coal development are made only after Albertans have had an opportunity to review and provide input on the legislative framework that will govern the future of the Eastern Slopes.

How MLAs Can Evaluate CIMI

As the Ministry of Energy and Minerals finalizes coal modernization policies, MLAs can evaluate whether the framework:

Reflects Public Input

A key objective of CIMI should be restoring and maintaining public confidence in government decision-making related to coal. Albertans, municipalities, Indigenous Nations, agricultural producers, businesses, and community organizations have invested significant time and effort in discussing the future of coal development in Alberta. For that engagement to be meaningful, CIMI should provide meaningful opportunities for public consultation on the draft policy and clearly demonstrate how public feedback and the recommendations influenced the final policy framework.

A transparent decision-making process is essential to ensuring Albertans have confidence that major policy decisions affecting water security, rural communities, property rights, and local economies are being made in the public interest.

Reflects Public Input

MLAs should assess whether CIMI:

- Includes meaningful opportunities for public participation before the policy is finalized.
- Demonstrates how concerns raised by municipalities, landowners, agricultural producers, Indigenous Nations, and local communities were considered in developing the policy.
- Provides transparent rationale where government decisions differ from recommendations made through the engagement process.
- Reflects the priorities consistently identified by Albertans, including protection of headwaters, water quality, and long-term certainty for communities.
- Strengthens public trust by demonstrating that engagement outcomes meaningfully influence policy, rather than serving only as an advisory exercise.

Provides Regulatory Certainty

Regulatory certainty requires clear, durable, and enforceable rules. Ambiguous definitions, exemptions, or project-by-project decisions create uncertainty for communities, landowners, municipalities, investors, and industry.

All forms of coal mining, including surface and underground mining, require significant disturbance of vegetation, soils, rock, and water systems to access coal reserves. These activities can result in habitat loss, impacts on agricultural operations, decrease in tourism and recreation opportunities, displacement of existing land uses and public land access, air pollution, and risks to water quality and availability.

Without legislation that permanently prohibits new coal exploration and development in the Eastern Slopes, there is no lasting certainty that future governments or regulators will maintain protections for the environmental, social, and economic values that Albertans rely upon.

Provides Regulatory Certainty

MLAs should assess whether CIMI:

- Clearly defines which forms of coal exploration, development, and mining are prohibited.
- Prevents future reinterpretation or regulatory exemptions that would allow coal development in the Eastern Slopes.
- Provides legislative certainty rather than relying solely on policies, directives, or ministerial discretion.
- Addresses risks across the landscape rather than assessing projects individually.

Protects Alberta's Air Quality and Water Security

Clean and reliable water is foundational to Alberta's agriculture, municipalities, industry, and economy. Current mitigation approaches have not demonstrated an ability to fully prevent the release of selenium and other contaminants associated with either surface or underground coal mining.

Recent research by government scientists has shown that the environmental impacts of coal mining are more extensive and far-reaching than previously understood. At the same time, multiple operating coal mines in Alberta have reported wastewater incidents, and water quality guidelines designed to protect people and aquatic ecosystems have been repeatedly exceeded. If existing operations continue to experience contamination issues, it raises important questions about the province's ability to effectively manage risks from additional coal developments.

Government scientists have also documented coal dust contamination more than 50 kilometres from mining operations. Coal dust and other particulate pollution can travel significant distances, crossing jurisdictional boundaries and affecting human health, wildlife, and ecosystems. Even underground mines require above-ground coal handling, processing, storage, and transportation infrastructure that can generate dust and emissions and reduce air quality.

Protects Alberta's Air Quality and Water Security

MLAs should assess whether CIMI:

- Establishes legally enforceable contaminant limits to achieve zero release of selenium and other harmful pollutants from coal mining operations.
- Addresses surface-water, groundwater, soil, and air quality impacts.
- Incorporates the latest scientific research on coal mining impacts and cumulative watershed effects.
- Requires mitigation measures to be proven effective under operating mine conditions before they can be relied upon to prevent environmental impacts.
- Ensures mitigation and management systems are able to be managed in perpetuity, given the long timeframe for full restoration.
- Demonstrates how new coal projects would avoid problems that have occurred at existing mines.

Protects Taxpayers

Coal mining can create environmental liabilities that persist long after mining operations cease. Reclamation, water treatment, monitoring, and maintenance can continue for decades and, in some cases, indefinitely.

Current financial security requirements are not sufficient to guarantee that companies, rather than taxpayers, bear the full cost of these long-term obligations. There is also significant uncertainty about whether coal mines in the Eastern Slopes can be restored to a condition that adequately protects downstream communities, aquatic ecosystems, and drinking water supplies.

A fiscally responsible approach requires ensuring that Albertans are not left with future cleanup costs or perpetual water treatment liabilities.

Protects Taxpayers

MLAs should assess whether CIMI:

- Requires companies to provide full financial security for reclamation before development begins.
- Prevents long-term environmental liabilities from being transferred to taxpayers.
- Accounts for worst-case reclamation and water treatment costs.
- Establishes clear standards for what constitutes successful reclamation.

Supports Sustainable Economic Development

Resource development should be evaluated based on its long-term public benefit, economic viability, and impacts on existing industries such as agriculture, tourism, recreation, and municipal economies.

Coal produced in Alberta is largely destined for export markets, meaning economic benefits are closely tied to global commodity demand and international pricing. The Alberta Energy Regulator has identified distance to market as a competitive disadvantage for Alberta coal producers. In addition, all currently proposed Eastern Slopes coal projects are foreign-owned and intended primarily to serve overseas markets.

Research has shown that coal companies overstate purported benefits of their mines. Independent economic analysis has raised questions about the quality and competitiveness of some Alberta coal deposits, including at Grassy Mountain, and whether projected economic benefits have been overstated. These concerns are particularly relevant when considering potential impacts on other businesses and industries that depend on clean water, healthy landscapes, and Alberta's natural reputation.

Supports Sustainable Economic Development

MLAs should assess whether CIMI:

- Evaluates the full economic costs and benefits of coal development.
- Assesses impacts on agriculture, tourism, recreation, municipal infrastructure, and other existing sectors.
- Considers long-term market demand and the economic viability of developing this uncertain resource.
- Accounts for potential costs associated with water contamination, reclamation, environmental liabilities, and public health impacts.
- Demonstrates a clear net public benefit for Albertans over the long term.



Alberta's Window Mountain Lake has been contaminated by airborne coal dust from coal mines in B.C.'s Elk Valley.

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