



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

April 1, 2026

The Honourable Julie Dabrusin
Minister of Environment, Climate Change, and Nature
House of Commons
Ottawa, Ontario, Canada, K1A 0A6
Email: ministre-minister@ec.gc.ca

RE: Alberta Wilderness Association's Letter of Support for Wildsight's Request for an Independent Review Panel on the Fording River Extension Project

Dear Minister Dabrusin,

Alberta Wilderness Association (AWA) is writing to you today to express our support for the formal request made by Wildsight on March 23, 2026¹; as the Minister of Environment, Climate Change and Nature, it is critical you refer the Fording River Extension Project to an independent review panel under the *Impact Assessment Act*, as the project poses threats to numerous areas under federal jurisdiction.²

Since 1965, AWA has strived to help Canadians understand the intrinsic values that the environment provides and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. AWA represents over 10,000 members of the public, and is dedicated to conserving and protecting water, wildlife, and wild spaces in Alberta.

As evidenced by recent research from scientists with Alberta's Ministry of Environment and Protected Areas, the pollution from the Elk Valley Mines including Fording River transcends provincial borders.^{3,4} Researchers have found that the fugitive coal dust generated during mining operations is being carried downwind, over the Continental Divide of the Rocky Mountains into Alberta where it is being deposited across vast regions along the Eastern Slopes.

This contaminant laden coal dust is settling in the headwaters of the Oldman and Bow Rivers, accumulating in the snowpack that feeds river flows throughout the year and provides drinking water for many communities and major cities downstream like Calgary and Lethbridge. Locations were sampled for coal dust up to 60 kms away from the mines, with researchers noting that the high

¹ Wildsight (2026) [RE: Request for Referral to an Independent Review Panel – Fording River Extension Project \(Reference No. 80702\)](#), email sent March 23, 2026, accessed March 31, 2026

² [Impact Assessment Act, 2019](#)

³ Cooke, C.A., & Drevnick, P.E. (2022) [Transboundary Atmospheric Pollution from Mountaintop Coal Mining](#), Environmental Science & Technology Letters, 9 (11), 943-948, "Cooke & Drevnick, *Lake Pollution*"

⁴ Cooke, C.A., Holland, K.M., Emmerton, C.A., Drevnick, P.E., Criscitiello, A.S., and Newton, B. (2024) [Mountaintop Removal Coal Mining Contaminates Snowpack across a Broad Region](#), Environmental Science & Technology, 58 (26), 11718-11726, "Cooke et al., *Snowpack Pollution*"

concentrations measured at some of the furthest sites suggest their “sampling area failed to fully characterize the size of the impacted area.”⁵

This is concerning because “exposure to atmospheric particulate matter is the leading environmental threat to human health” and the coal dust contains polycyclic aromatic compounds (PACs) which are known carcinogens.⁶ The fugitive coal dust is found to be both an atmospheric pollutant while it is transported by the wind, as well as a source of terrestrial and aquatic pollution as it settles onto the landscape and drains into the watershed. In a number of sampling locations, the PACs were found at concentrations well exceeding water quality guidelines, rivalling levels observed in some of Canada’s most industry-impacted ecosystems.

Considering the spatial patterns of dust deposition observed, the researchers suggest that the majority of pollution is driven by operations at the Fording River and Greenhills mines. The scientists also note that while current air monitoring requirements at the federal and provincial levels do not require the Elk Valley Mines to report their atmospheric PAC emissions, because the Mine’s monitoring stations are upwind the sites, “with no stations located north or east of the Fording River Mine where [researchers] find deposition to be the highest”, “the ambient air quality objectives and regional monitoring program are not protecting areas downwind from poor air quality and dust deposition, nor are they protecting sensitive receptors from PACs in the coal dust.”⁷

In related research looking at coal dust deposition in Window Mountain Lake, Alberta, researchers conclude that “permitting of existing mines and approval of new mines should consider, and have mitigation plans, for broader, atmospheric impacts.”⁸

Along with the reasons highlighted by Wildsight in their request, scientific research like this reiterates the need for federal participation and the establishment of an independent review panel for the Fording River Mine Extension Project. Federal involvement is necessitated through the,

- *Canadian Environmental Protection Act, 1999*, whereby every individual in Canada has the right “to live in an environment that is protected from harmful substances, pollutants, and waste”.⁹
- *Constitution Act, 1867*,
 - *ss. 91(29) and 92(10)(a)*, whereby the federal government can regulate “other Works and Undertakings... extending beyond the Limits of the Province” and,
 - *s. 91(12)*, “Sea Coast and Inland Fisheries” which gives the federal government authority to regulate water quality to protect fish habitat.¹⁰
- *Fisheries Act, 1985*, s. 35(1) which states that “no person shall carry on any work, undertaking or activity that results in the harmful alteration, disruption or destruction of fish habitat” (HADD),

⁵ Ibid, pg. 11722

⁶ Ibid, pg. 11724

⁷ Ibid, pg. 11724

⁸ Cooke & Drevnick, *Lake Pollution*, pg. 947

⁹ [Canadian Environmental Protection Act, 1999](#)

¹⁰ [Constitution Act, 1867](#)

and empowers the Minister through ss. 35.1(1) and (2) to designate any work, undertaking or activity likely to result in the death of fish or HADD.¹¹

Southern Alberta's foothills and Rocky Mountain ecosystems are already experiencing pollution from the existing coal mining operations in the Elk Valley. We are only beginning to understand the extent of this pollution, and do not yet know its full ecological and health impacts. It is pollution in otherwise remote, largely intact wilderness areas high in biodiversity that provide essential ecosystem services for the province, which we have no control over; British Columbian authorities permitted these mines, but people living in Alberta bear the consequences. The extension cannot be reviewed without considering these broader interprovincial impacts and implications.

To ensure the process is robust, unbiased, transparent, and provides sufficient opportunities for public consultation, the federal government must appoint an independent review panel of experts to examine the Fording River Mine Extension and determine whether it is in the public interest.

Sincerely,

Alberta Wilderness Association

<Original signed by>

Kennedy Halvorson
Conservation Specialist

¹¹ [Fisheries Act, 1985](#)