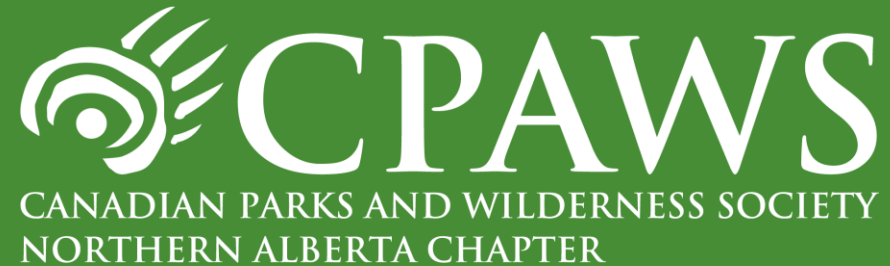


Gillian Chow-Fraser

Boreal Program Manager
gchow-fraser@cpaws.org



Wood Buffalo National Park management concerns

Civil society organizations have strongly supported the move toward co-management of WBNP, operationalizing co-governance and collaborative decision-making structures, and the sharing of park management roles across all levels.

While progress has been made, more work is needed to share authority and co-develop management plans.

Current models exist in the Parks Canada system (e.g. Thaidene Nene).

Recommendation: Continue to work toward co-governance structures and support capacity-building where needed.



Wood Buffalo National Park management concerns

Wood Buffalo National Park Management Plan review was due for 2020, but delayed without public notice.

Recommendation: Carry out an urgent management planning process that integrates appropriate Action Plan items. Management plan should be co-developed with Indigenous communities.



Recovery actions are important to the public

National Parks are managed to ensure ecological integrity of these places for present and future generations – it is managed on behalf of the public and in the public's interest.

Since Day 1 of the Mission, a CPAWS action has asked the public to send letters to Ministers to urge more collaboration to save Wood Buffalo.

Over **3,100 letters** have been sent in just one week.



We know our voices make a difference

We live in a province where people are extremely passionate about enjoyment and protection of our beautiful outdoors.

Use our letter-writing tool below to let the Government of Canada and the Government of Alberta know you want to see them work together to address the dangers to one of Canada's incredible World Heritage Sites.

Your letter will be sent to the Federal Minister of the Environment and Climate Change and the Alberta Minister of Environment and Parks.

Minister Steven Guilbeault

Environment and Climate Change Canada

Honourable Whitney Issik

Government of Alberta

Provincial and federal governments must work together to address dangers to Wood Buffalo National Park

Dear Ministers,

I urge you to work together to take urgent action to save Wood Buffalo National Park. Right now, a joint IUCN/World Heritage Committee Reactive Monitoring Mission is visiting Alberta and the Northwest Territories. If the mission finds immediate and serious threats face the park, they will recommend it is added to the list of "World Heritage in Danger" – for the first time ever in Canada.

We call on all levels of government to prioritize the recovery of Wood Buffalo National Park by protecting the unique ecological values that have earned the Park its international status as a World Heritage Site.

The federal government has shown it is willing to act for Wood Buffalo before by investing \$88 million in the Park's action plan. But the scale and pace of change needed to turn things around for the park is still much more. Long-term support and leadership by all levels of government is needed on several critical issues, including on water governance frameworks with federal, provincial and Indigenous

Email

gchow-fraser@cpaws.org

Weak relationship between civil society and Wood Buffalo NP

A collective of environmental groups and Indigenous communities have met regularly every month since 2016.

Submitted seven joint letters with a cumulative representation of **44 different partners** on these letters.

We reached out several times to meet with Parks staff and invite them to participate in our joint meetings. Unfortunately, we rarely receive a response.

Recommendation: Include the public in Action Plan implementation communications and engage with civil society to support public interests.

Alberta Chapter of the Wildlife Society
Alberta Wilderness Association
Alternatives North
Alliance 4 Democracy
Assembly of First Nations Alberta Association
Athabasca Chipewyan First Nation
Audobon Society
Birds Canada
Canadian Association of Physicians for the Environment – Alberta Regional Committee
Canadian Freshwater Alliance
Council of Canadians
Cumulative Effects Environmental Inc.
CPAWS British Columbia
CPAWS National
CPAWS Northern Alberta
CPAWS Northwest Territories
David Suzuki Foundation
Dene Nation
Endeavour Scientific Inc.
Environmental Defence
Environment Law Clinic
Ecology North

Fort Chipewyan Metis Association
Hamlet of Fort Resolution
Indigenous Climate Action
Indigenous Heritage Circle
International Buffalo Relations
Institute Keepers of the Water
Mikisew Cree First Nation
Mining Watch Canada
Nature Alberta
Nature Canada
Northwest Territory Metis
Peace Valley Environmental Association
Pembina Institute
RAVEN
Sierra Club BC
ShagowAskee Foundation
Smith's Landing First Nation
Wildlife Conservation Society Canada
Dr. David Suzuki
Dr. Brenda Parlee
Dr. Martin Carver
Vicky Husband
Robert Cameron

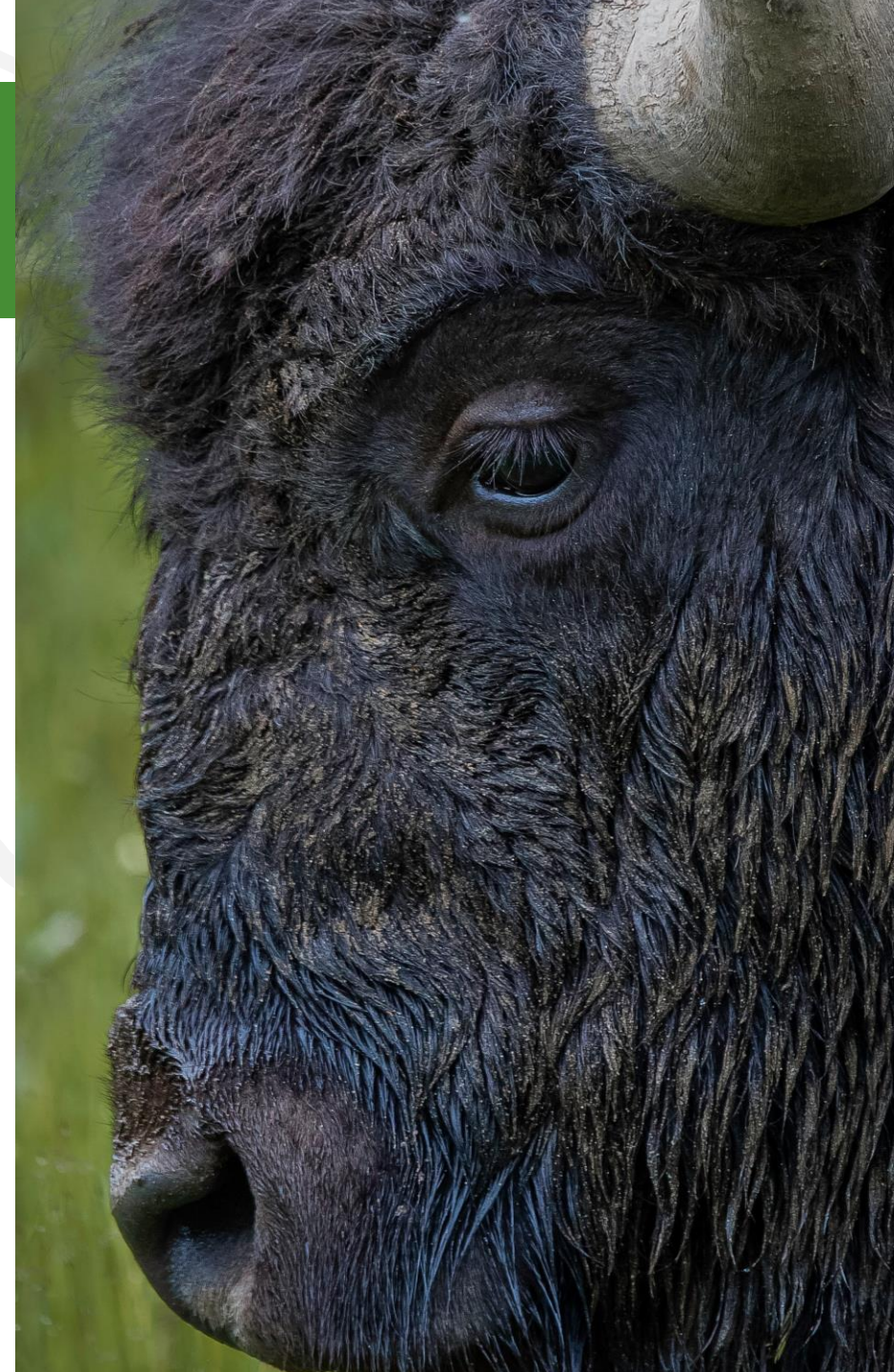
Provincial challenges – On-the-ground in Alberta

The current provincial government has a track record of de-prioritizing environmental impacts of land uses.

Strong example: Alberta's Minister of the Environment **suspended** oil sands monitoring and reporting requirements in May/June 2020.

Some oil sands projects went **11 weeks** without monitoring and reporting requirements during Spring bird migration – operations continued.

Key Point: The monitoring suspensions exemplify our caution around legislation, framework, and/or processes that the Action Plan is reliant on for protecting downstream impacts. It weakened public trust in “world-class” oil sands management.

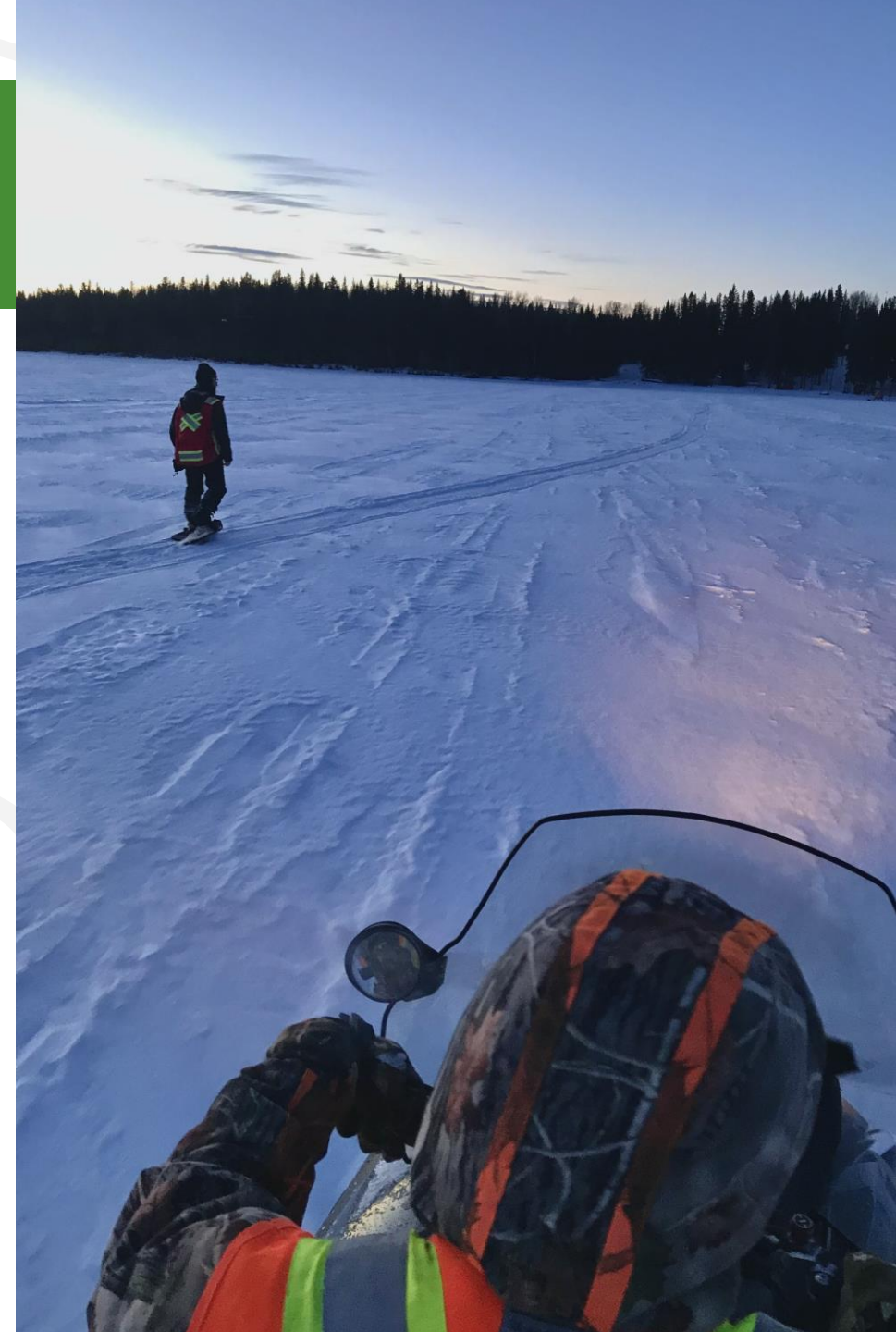


Poorly addressed oil sands impacts to Wood Buffalo National Park

There are known effect pathways from the oil sands on Wood Buffalo National Park downstream, as confirmed by the Strategic Environmental Assessment (2018).

Since the last mission in 2016, the Alberta Energy Regulator has:

- Issued 484 oil sands leases (which cover an area of 563,000 hectares)
- Approved over 100 oil sands projects ("schemes")
- The expansions of the Canadian Natural Resources Limited (CNRL) Horizon North Pit and Suncor Base Mine are both underway – which would add over 33,000 hectares of new mines.



Poorly addressed oil sands impacts to Wood Buffalo National Park

Oil Sands Bird Monitoring Program

Oil Sands Monitoring (OSM) Program and Action Plan items

Tailings impacts and reclamation



Garth Lenz

Poorly addressed oil sands impacts to Wood Buffalo National Park

Oil Sands Bird Monitoring Program

Refer to Dr. Colleen Cassady St. Clair's letter submitted to Mission leads.

The existing bird monitoring program is not standardized and data are not publicly available on landings.



Poorly addressed oil sands impacts to Wood Buffalo National Park

Oil Sands Bird Monitoring Program Recommendations:

1. Rigorous, transparent monitoring of bird landings and mortality in the oil sands region. The results must be made publicly available and should inform deterrent effort to bird risk.
2. Whooping cranes should be actively monitored *via* GPS tags and independent, rigorous study by government biologists to determine the extent to which cranes use tailings and mitigate risks.
3. Full-cost accounting should be applied to bird deterrence programs to ensure that all environmental impacts are addressed and minimized.



Poorly addressed oil sands impacts to Wood Buffalo National Park

Oil Sands Monitoring (OSM) Program and the Tailings Risk Assessment

In the OSM 2020-21 Budget, four AP projects were cut from the budget (funded in the previous year), including the Tailings Risk Assessment.

We requested a meeting with the OSM co-chairs to discuss how OSM relates to WBNP AP, but did not receive a response.



Garth Lenz

Poorly addressed oil sands impacts to Wood Buffalo National Park

Recommendation:

Complete the Tailings Risk Assessment, including an independent assessment of tailings profiles and risk pathways to the PAD, and assess risks of all reclamation options.

Key Point:

OSM not a reliable or robust process for monitoring or mitigating downstream impacts to WBNP.



Garth Lenz

©Garth Lenz

By all measures, tailings are growing.

1975



2020



By 2020, fluid tailings area covered over 120 km².

Total tailings area covered 300 km².

■ Fluid Tailings Area*
■ Total Tailings Area*

All maps from this report can be freely downloaded at <https://bit.ly/3MBeFOa> or by request to

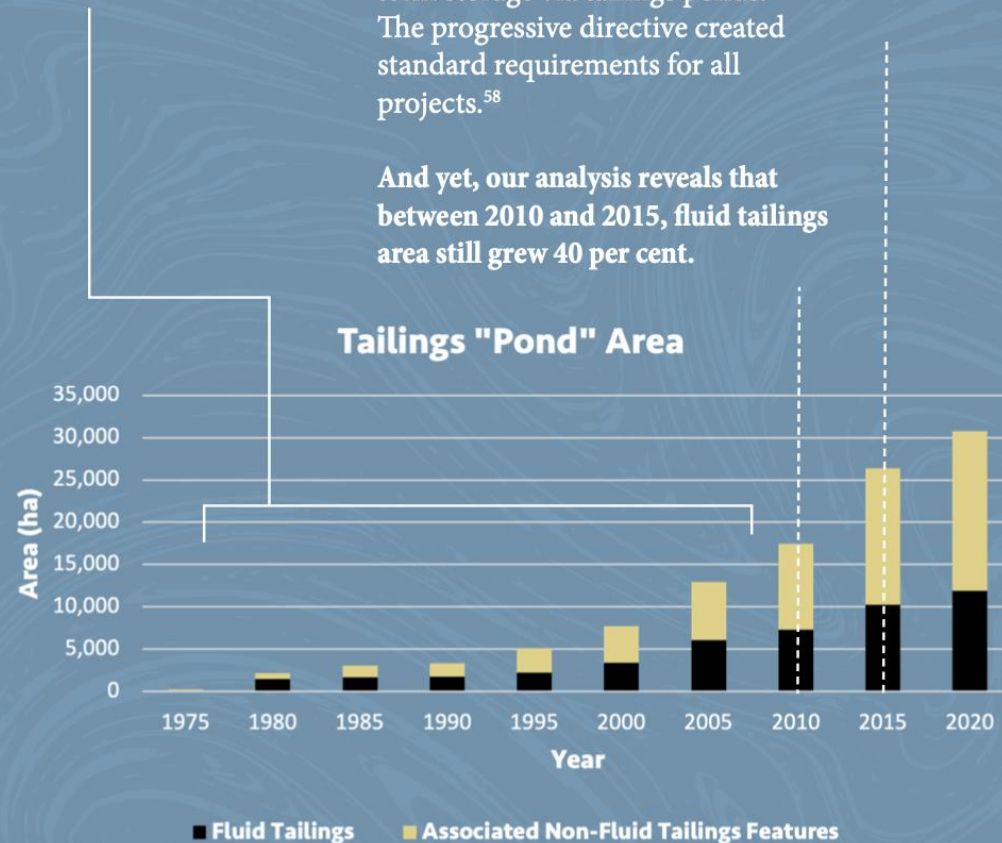
Tailings reclamation expectations:


Up until 2009, there were no regulations specific to managing or reclaiming oil sands tailings, meaning there were no mechanisms to control or limit how much tailings fluid, or how many tailings “ponds”, were made and reclaimed by industry.⁵⁶

In 2009, new direction was provided to regulate tailings, in part because it was known that oil sands operators were exceeding expected tailings volumes from their original project applications⁵⁷. The requirements set forward aggressive reclamation expectations, focused on targets for slowing growth of tailings and moving away from long-term storage via tailings ponds. The progressive directive created standard requirements for all projects.⁵⁸

This direction was entirely abandoned in 2015, just six years later, as it became clear most operators would not meet the targets and an updated direction on tailings was released in 2016 by the regulator. The new requirements no longer imposed standard requirements across all projects⁵⁹.

And yet, our analysis reveals that between 2010 and 2015, fluid tailings area still grew 40 per cent.



An aerial photograph of a river delta, showing a complex network of channels and distributaries. The water is a deep blue, and the land is a lighter, sandy brown. A semi-transparent dark blue rectangular box is overlaid on the center of the image, containing white text.

We make six key recommendations to improve the environmental outlook for tailings management in the oil sands region:

- 1. Do not create any new tailings “ponds” and do not approve new oil sands mines.**
- 2. Develop and implement a comprehensive tailings reclamation plan for the oil sands region, prioritizing environmental outcomes and the concerns of impacted downstream communities.**
- 3. Require the collection and holding of the total funds that will be needed for oil sands mine clean up and rehabilitation.**
- 4. Uphold the United Nations Declaration on the Rights of Indigenous Peoples and respect Indigenous sovereignty.**
- 5. Strengthen cross-jurisdictional collaboration with all levels of government on the management of tailings.**
- 6. Strengthen the oil sands bird monitoring program so it is a transparent, standardized and collaborative program.**

Poorly addressed oil sands impacts to Wood Buffalo National Park

Recommendation:

Gaps in oil sands tailings management need to be addressed, including enforcement and compliance, assessment of risk of reclamation technologies, transparency, and environmentally-driven and community-driven reclamation criteria.

Precautionary principle should be fundamental to regulatory processes – "no degradation" standards for the Athabasca River.



Concerns regarding potential treated tailings release:

Comments from:

Calvin Sandborn, UVIC
Environmental Law Clinic

Jesse Cardinal, Keepers of the Water

Dr. John O'Connor, Canadian Association
of Physicians for the Environment

