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The Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
House of Commons
Ottawa, ON K1A 0A6

February 6, 2020

Dear Minister Wilkinson,

I am writing in regard to Teck Resources' proposed Frontier mining project which comes before cabinet this month. Despite claims from Teck Resources to create a carbon-neutral project by 2050, there are clear indications the mining project will be totally incompatible with Canada's commitments to reduce greenhouse gas emissions, protect the environment, and uphold indigenous rights.

First, while Teck Resources may well be able to reduce emissions in some areas as new technologies arise, Environment and Climate Change Canada's own submission to the review panel concluded that "while Teck indicates its intent to make the Frontier Mine project best-in-class with respect to GHG emissions intensity, it is in fact 24 per cent more carbon intensive on a per-barrel basis than the best project." Likewise, the Oilsands Environmental Coalition has raised strong doubts about the claims of Teck Resources based on the omissions of sources of greenhouse gas associated with the project. <https://www.ceaa-acee.gc.ca/050/documents/p65505/125100E.pdf#page=27>. Indeed, it is more likely that the emissions from the Frontier project would rise steadily throughout the life of the mine (estimated to be 41 years) as bitumen becomes more difficult to access.

Second, while Teck Resources has secured the initial support of all 14 of the First Nations and Metis communities affected by the proposed mine, the Alberta government is destabilizing this support by failing to address environmental concerns <https://www.cbc.ca/news/politics/athabasca-oilsands-teck-frontier-mine-climate-jason-kenney-1.5391479>. In addition, Indigenous youth from Canada who attended COP 25 have expressed clear concerns about the Frontier mine <https://www.cbc.ca/news/indigenous/first-nations-youth-oilsands-madrid-cop25-1.5389633>.

Third, the premise on which the joint federal-provincial review panel recommended the federal government approval of the mining project must be challenged. The panel tries to balance economic and environmental concerns. It notes “significant adverse environmental effects,” such as the removal of 3,000 hectares of old-growth forest, negative effects on biodiversity, significant impacts on local wildlife species and the disturbance of 14,000 hectares of wetlands including the “irreversible” loss of 3,000 hectares of peatland, a highly sensitive and important carbon sink. Then the panel concludes these critical concerns are outweighed by the economic benefits the project would bring to the region.

It is time for the federal government to move beyond efforts to *balance* the economy and the environment. Rather, we must *integrate* economic and environmental concerns. In a global economy which increasingly recognizes the need to de-carbonize, Canada should be leveraging its existing energy workers and infrastructure to lead the way in this transition. The public interest is best served through strong, effective efforts to address the climate emergency; we can create good jobs which use and support alternative energy sources, protect the environment, invest in social infrastructure, and establish robust social protections for all.

Canada is at a crucial crossroads. We need to take immediate, strong action on climate change. To do our fair share in the world, Canada needs to reduce our domestic GHG emissions by at least 60% from 2005 levels over the next 10 years as our initial steps toward fully decarbonizing the Canadian economy to achieve net zero domestic GHG emissions as early as possible before 2050. Given this ethical imperative and the aforementioned economic and environmental concerns, the Frontier mining project is the wrong choice for Canada.