February 12, 2026

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

RE: Concerns about the *Proposed Coal Mining Effluent Regulations*

Dear Minister Dabrusin,

On behalf of the 14 agricultural, community, environmental, health, landowner, and recreation organizations undersigned, we are writing to express our deep concern about the federal *Proposed Coal Mining Effluent Regulations* (CMER).

Albertans are concerned about coal. This has been made repeatedly clear over the last decade as the threat of coal exploration and mine development in our most important and sensitive headwaters region has grown.

The public backlash has been so strong and sustained that provincially the Alberta government has been forced to walk back numerous policy decisions to address public concerns. When the public was finally consulted on the province's coal policy back in 2021, the first survey saw almost 25,000 participants, of which more than 85 % "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"[1].

This sentiment remains. A majority of Albertans continue to be concerned about coal mines, particularly their impact on source waters, which provide flows and drinking water for the province and communities downstream in Saskatchewan, Manitoba, and the Northwest Territories. The health impacts of coal mining and effluent cannot be overstated[2]. Coal mining releases toxic substances such as selenium, arsenic, lead, and mercury into waterways. These pose serious risks to human health, including increased risks of cancer, neurological damage, and developmental issues in children. These contaminants bioaccumulate in fish, entering the food chain and impacting the health of Indigenous and local communities that rely on these waters for drinking, fishing, and cultural practices. Failure to adequately address these health risks leaves communities vulnerable to long-term harm. As a group actively engaged in ensuring these waters are protected, the proposed CMER only exacerbates growing unease.

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[1] Initial engagement survey results
[2] A Review of Human Health Impacts of Selenium in Aquatic Systems

The federal government has made several important commitments to safeguard Canada's natural heritage and live up to international expectations for responsible resource development. This includes co-founding the international Powering Past Coal Alliance, committing to banning all exports of thermal coal from and through Canada by 2030[3] and through the targets outlined in *Canada's 2030 Nature Strategy: Halting and Reversing Biodiversity Loss in Canada,* specifically Target 4: Species at Risk Recovery, and Target 7: Pollution and Biodiversity.

ECCC needs to rationally regulate coal extraction where it has jurisdiction, and CMER provides an opportunity to safeguard Canada's freshwater. However, the latest draft of the *Proposed Coal Mining Effluent Regulations* is wholly inadequate to do so. Decades behind the best available science and inconsistent with many other jurisdictions, including both the federal *Canadian Water Quality Guidelines for the Protection of Aquatic Life* and the provincial *Environmental Quality Guidelines for Alberta Surface Waters*, the *Regulations* cannot be published without substantial revisions.

The current draft of the CMER is out of date, as it was drafted to encourage coal extraction and accept the significant environmental costs of that extraction. However, federal government policy has emphasized the need for Canadian steel manufacturing to be decarbonized using technological developments. The federal government has made important investments to develop a domestic low-carbon steel industry,[4] and has set goals of shifting investment away from polluting carbon intensive extraction projects and towards critical mineral development.

Metallurgical coal is not a critical mineral needed for the future economy, and Canada already produces significant metallurgical coal from the massive and environmentally damaging mines in British Columbia's Elk Valley. Encouraging metallurgical coal extraction risks overdeveloping a sunset industry. New coal mines will cause significant environmental damage, produce an unneeded high carbon-emission product, and the mines are likely to stop production early and leave legacy environmental problems to be handled at public expense.

ECCC must revise the regulations to ensure:

- The suite of contaminants controlled through these regulations is expanded
- Effluent limits are clearly linked to the best available science on the protection of aquatic life.

[3] Government of Canada releases Policy Statement on future thermal coal mining projects and project expansions
[4] Canada's Steel Industry aiming for net zero CO2 by 2050

- All facets of the coal industry are subject to the regulations, with no exemptions.
- Effluent limits apply immediately when the regulations come into force and hold all mines to the same stringent standards.
- All coal mining operations are subject to monitoring, immediately and continually until water quality downstream returns to reference conditions upstream.
- The regulations account for cumulative effects, regional variability, and climate change.
- Consequences for coal mines that release effluent exceeding limits or effects thresholds are clearly established and effective in preventing environmental harm before it occurs.

We request a meeting with you to discuss this issue further. A letter with our detailed concerns will also be sent to the technical team within ECCC developing the *Regulations*.

Sincerely,

Alberta Wilderness Association

Alberta Environmental Network

Canadian Association of Physicians for the Environment

Castle-Crown Wilderness Coalition Society

Chinook Water*Shed Society

Crowsnest Conservation Society

Livingstone Landowners Group

Outdoor Recreation Coalition of Alberta (ORCA)

Northern Alberta Chapter of the Canadian Parks and Wilderness Society

Pekisko Group

Southern Alberta Chapter of the Canadian Parks and Wilderness Society

Trail's End Beef

The Gravity Well

Water for Food Group