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Steve Wilkie  
Senior Environmental Assessment Administrator  
Environmental Assessment and Stewardship Branch  
Saskatchewan Ministry of Environment  
3211 Albert Street  
Regina SK S4S 5W6  
Email: [environmental.assessment@gov.sk.ca](mailto:environmental.assessment@gov.sk.ca)

Dear Mr. Wilkie,

I recently learned of the CanPacific Potash company's Albany Project, solution potash mine proposed for near Sedley. I would like to register my opposition to this project and urge you to deny it Environmental Assessment approval.

There are several reasons why I think this project should not go ahead: its impact on native prairie and pastureland habitat which will harm wildlife, particularly endangered bird species, its excessive water usage, and its excessive greenhouse gas GHG emissions. I am also concerned about the 21 heritage resource sites that it will affect – the EIS provides no detail about these sites, but I think it is wrong to destroy ancient sites.

The purported benefits of the project – jobs and tax revenues are far outweighed by the costs. There are many ways to create jobs and bring in tax dollars, but once the landscape is destroyed, and endangered species are wiped out, water is pumped into underground formations, these are gone forever. The excess GHG emissions will worsen climate change and harm people who have had no benefit from the mine. This is a grave injustice, and it is a crime against future generations.

I will now provide more details to explain my positions.

The land in question is currently the home of the following species of special concern: American badger, Baird's sparrow, long-billed curlew, short-eared owl, western tiger salamander, the following threatened species: bank swallow, barn swallow, bobolink, ferruginous hawk, loggerhead shrike, Sprague's pipit. The site would also displace five active sharp-tailed grouse leks. The sharp-tailed grouse is the official bird of Saskatchewan.

The proposed mine, consisting of a plant site and a well field, would involve removing soil and building roads, setting up large machinery installations and generate significant heavy traffic. It would be noisy and dusty, and there would be light pollution. This is entirely incompatible with wildlife. The mine would be operating for about 70 years. It appears that both expansion in area and extension in time beyond the current proposal is also being contemplated. The project developer makes the bizarre claim that impacts on wildlife will not be significant because when the mine is decommissioned because the soil will be put back and revegetated. How will these animals and birds survive for 70 years without a place to live?

60 percent of the proposed well field area is currently wildlife habitat that would be directly harmed by the mine. Only 38.2 percent is cultivated cropland and 4.4% is roadways and farm yards. The rest is untilled pastureland and grassland (47.1%), cropland (38.2%), and wetlands (9%) and intermittent streams (1.3%). The project would destroy 140 acres of wetlands within the proposed plant site boundary. The company claims they would develop a wetland compensation plan to make up for their destruction, but how would this be possible? It is unlikely they would purchase farmland and covert it to wetlands. It is more likely that the wetlands would simply be lost forever.

Projected water consumption of the project ranges from 5,279,262 to 8,710,782 gallons per day, which would be drawn from Buffalo Pound Lake. According to Statistics Canada, Canadian water usage per capita is about 102 gallons per day. So the Albany Project would use as much water as 52,000 to 85,000 people – more than the

populations of Moose Jaw and Swift Current combined. Furthermore, the water would be removed from the ecosphere, after being saturated with salt it would be injected deep underground from where it could never return.

We know that we are entering very unpredictable times as a result of climate change. Temperatures will rise, the glaciers will disappear, and Saskatchewan will become entirely dependent on rainwater to fill the rivers and provide drinking water for the population, for livestock and for crops. It seems unwise, to say the least, to remove up to 3 billion gallons of water from the ecosystem every year for 70 years in order to extract potash from this one mine. The Ministry has already approved the Mosaic Kronau Project, a 2.9 million tonne/year potash mine proposed to be located approximately 32 km northwest of the Albany Project and the 2.8 million tonne/year Western Potash Milestone Project, approximately 34 km southwest of the Albany Project. If all three proceed, the loss of water from Buffalo Pound will be truly alarming.

The Albany Project will also contribute an alarming amount of GHG emissions if allowed to proceed. The proponent estimates it will emit 351,000 tonnes of CO<sub>2</sub>e per year during operation. This is due, no doubt, to the fact that solution mining of potash requires the water to be heated to 100 degrees C. The Environmental Impact Statement does not specify what fuel will be used to heat the water. Probably it would be natural gas. It is estimated that a car emits 4.6 tonnes/year, so operating the Albany Project would be like putting 76,300 additional cars on the road – for 70 years or more! This is close to 10% of all the cars registered in Saskatchewan in 2017.

To add insult to injury, the Saskatchewan royalty structure practically gives away the potash itself. According to *Saskatchewan Potash Taxes and Royalties: Is it Time for a Review?* by Jim Marshall, Executive-in-Residence, Johnson Shoyama Graduate School of Public Policy, in 2017 exports of potash from Saskatchewan amounted to over \$5.0 billion, but Saskatchewan's effective royalty rate is from 2.1 to 4.5 percent, much less than royalty rates of the past. Furthermore, new mines are subsidized or exempted from taxes to encourage investment. Marshall refers to the 2015 analysis by D. Chen and J. Mintz which concludes that Saskatchewan's royalty regime “could provide a perpetual exemption if the industry grows to new production levels and could undermine the tax base in future years.”

(<https://www.schoolofpublicpolicy.sk.ca/research/publications/policy-brief/saskatchewan-potash-taxes-and-royalties-is-it-time-for-a-review.php> ).

The Albany Project is a joint venture between a Russian multinational, Acron and Rio Tinto, one of the world's biggest mining companies. Profits from the mine would leave Saskatchewan and Canada. This means if the Albany Project is approved, profits will exit our economy and Saskatchewan will obtain little to no royalty revenue, yet we will lose irreplaceable native prairie forever, remove billions of gallons for water from our ecosystem, and hasten catastrophic climate change by increasing GHGs. Furthermore, the potash itself would be used to fertilize crops in other countries which may well take away markets from our own farmers. The profits from the potash mine would go to shareholders outside of Canada.

In light of all this, I urge you to deny Environmental Assessment approval for the Albany Project.

Sincerely,

Cathy Holtslander  
1516 Cairns Ave.  
Saskatoon, SK  
email: [choltslander@sasktel.net](mailto:choltslander@sasktel.net)