



March 24, 2026

Hon. Julie Dabrusin

Minister of Environment and Climate Change

12th floor, Fontaine Building, 200 Sacré-Coeur Boulevard, Gatineau QC K1A 0H3

Sent via email to: ministre-minister@ec.gc.ca; information@iaac-aeic.gc.ca

Cc: Terence Hubbard, President, Impact Assessment Agency of Canada, terence.hubbard@iaac-aeic.gc.ca

Cc: Dawn Farrell, Chief Executive Officer, Major Projects Office, info@mpo-bgp.gc.ca

Cc: Tim Hodgson, Minister of Energy and Natural Resources, HonTim.Hodgson@nrcan-rncan.gc.ca

Re: The Pathways Alliance CO₂ Transportation Network and Storage Hub Project

Dear Minister Dabrusin and the Impact Assessment Agency of Canada,

My name is Dr. Amil Shapka, and I am writing to you on behalf of a group of citizens from in and around St. Paul, Alberta (“No CO₂ Pipelines Alberta”) who are concerned about the safety and environmental risks of the Pathways Alliance (now renamed the “Oil Sands Alliance”) CO₂ transportation network and storage hub project (the “Pathways Project”) proposed for our community.

The Pathways Project is currently being negotiated as part of the Canada-Alberta [Memorandum of Understanding](#) (MOU), signed on November 27, 2025, which includes an April 1, 2026 deadline for a trilateral MOU between Alberta, Canada, and the Pathways partner companies.

No CO₂ Pipelines Alberta is a grassroots, non-partisan organization of friends and neighbours in the County of St. Paul and the Municipal District of Bonnyville, Alberta. We are concerned with protecting our land and preserving our quality of life. Many of our members represent multi-generational family farms that are the cornerstones of our community. Portions of the Pathways Project are expected to be built on and around our lands and CO₂ is planned to be injected below our community, and many of us are within the “hazard zone” surrounding the proposed pipeline.

Part 1: Request to resume the existing federal impact assessment process for the Pathways Alliance CO₂ Transportation Network and Storage Hub Project

On November 28, 2024, [eight First Nations submitted a request](#) to Steven Guilbeault, minister of Environment and Climate Change Canada (ECCC) asking him to designate the Pathways Project for a federal impact assessment, following the Alberta Energy Regulator’s [decision to deny a request](#) for a provincial assessment on October 31, 2024. And on February 11, 2025, a

group of [38 organizations co-signed a letter](#) to ECCC Minister Guilbeault urging him to designate the Pathways Project for a federal impact assessment in support of the request made by the eight First Nations and separately, Athabasca Chipewyan First Nation (ACFN).

However, on December 13, 2024, the Impact Assessment Agency of Canada (IAAC) suspended the 90-day time limit within which a response with reasons must be issued to the request for designation of the Pathways Project. The Pathways Project remains in a “suspended” state according to the [IAAC registry](#) as of today’s date — at the request of the proponents.

The Pathways Project is a massive carbon capture, utilization, and storage (CCUS) project that was originally intended to address carbon emissions from the oil sands industry in northeastern Alberta. However, in the [press release](#) announcing the [formerly] Pathways Alliance’s recent rebrand to the Oil Sands Alliance, the consortium states that the name change was made to:

“... better reflect the purpose and mandate of the organization to promote growing the oil sands industry.”

This shift suggests that the purpose of the Oil Sands Alliance and their Pathways Project is no longer about reducing emissions from the oil sands industry, and it directly contradicts the justification for the inclusion of the Pathways Project in the AB-CAD MOU.

[According to the Government of Canada](#), it would be the largest CCUS project in the world, and allowing a project of this size to proceed without an environmental impact assessment is unacceptable. And according to the Supreme Court of Canada’s decision in [Reference re: Impact Assessment Act](#), an environmental impact assessment is: *“a planning tool that is . . . an integral component of sound decision-making.”*

Our concerns with the Pathways Project include (but are not limited to):

- **Health & Safety Risks:** CO₂ pipelines can leak and explode, causing convulsions, cardiac arrest, respiratory distress, and death for those in the area. Combustion engines can’t function around CO₂ leaks, meaning emergency vehicles can’t reach people in need.
- **Ignored Community Concerns:** This CCUS project is proceeding without the full consent of local landowners, neighbours, or affected municipalities and is failing to adequately inform landowners of the true risks of this project. Communities (and decisions affecting them) should be shaped by those who call them home.
- **Violation of Indigenous Rights:** This project is proceeding without the free, prior, and informed consent of affected Indigenous communities, and infringes on Indigenous Treaty, Constitutional, and inherent rights.
- **No Plan for Cleanup:** The oil and gas industry has a history of failing to properly decommission its infrastructure and rehabilitate the land in a timely manner. Without an

industry-funded cleanup plan, landowners will be left with impacts of aging pipelines and storage tanks under their properties forever.

- **Taxpayers Will Pay:** The Pathways CCUS project isn't possible without massive public subsidies from Canadian taxpayers. In fact, the proponent is asking for 75 percent public subsidies for its \$16 billion project. That's \$10-12 billion in corporate welfare. We do not support handouts for profitable oil and gas corporations at the public's expense.

Many local residents are still unaware that this project will bring and store an odourless asphyxiant into our community. We are concerned about human safety, ground water contamination, and negative effects to the environment. We have seen CO₂ pipeline explosions in the US that have [led to seizures](#), unconsciousness, and respiratory distress. In [Australia, they have banned](#) storing CO₂ underground because it will "likely cause an irreversible or long-term change in water quality" if it leaks and contaminates groundwater with lead and arsenic.

For the reasons listed above, and in addition to the November 28, 2024 request by First Nations, we call on you, as the responsible minister, to exercise your discretion to resume the federal impact assessment process for the Pathways Project, and to designate the Pathways Project for an impact assessment under section 9(1) of the *Impact Assessment Act* (IAA).

Part 2: Feedback on the Draft Co-operation Agreement on Environmental and Impact Assessment between Alberta and Canada

We are also writing to you to provide feedback on the [Draft Co-operation Agreement on Environmental and Impact Assessment between Alberta and Canada](#) (hereafter "Draft Cooperation Agreement") as part of the public engagement period initiated by IAAC on March 6, 2026 and ending on March 27, 2026. This consultation is intended to inform the development of the final co-operation agreement, including its implementation.

The Draft Cooperation Agreement states:

"When a proposed project is primarily within provincial jurisdiction, Canada will recognize Alberta as best placed to undertake an assessment and will rely on Alberta's environmental assessment or regulatory processes to assess the effects of the project including, as applicable, to address adverse effects within federal jurisdiction, as defined in the IAA, as outlined in this Agreement."

Our group firmly rejects the Draft Cooperation Agreement as a whole, and we have significant concerns with the proposal for Canada to defer to Alberta for impact assessments, especially for energy projects that would fall under the jurisdiction of the Alberta Energy Regulator (AER).

The AER is an industry-captured entity that has a proven legacy of failing to function as a credible regulator of energy development in Alberta, and is unable to meet its own stated mandate to "provide safe, orderly, and environmentally responsible energy development."

Recent examples of the AER's capture include (but are not limited to): [appointing a former oil and gas executive as its CEO](#), [failing to notify Indigenous communities of an oilsands tailings spill for nine months](#), [failing to investigate 97 percent of reported tailings spills from 2014 to 2023](#), [giving the oil and gas industry an 83% discount on its 2025 orphan well cleanup fee](#), and the [CEO unilaterally cancelling a public hearing for a proposed coal mine](#).

More specifically on the Pathways Project, the AER has already denied a request for the Pathways Project to undergo a provincial impact assessment. If the Pathways Project is going to play a critical role in the MOU signed between Alberta and Canada, then the federal government cannot just abandon its duty to assess the potential impacts of the "world's largest carbon capture project" while knowing that the AER has already declined to assess its impacts.

In addition to concerns about the AER and the Pathways Project, there are a number of reasons why Alberta's provincial assessment process is inadequate. These reasons are outlined below.

Alberta's environmental assessment legislation includes the *Environmental Protection and Enhancement Act* (EPEA), the *Natural Resources Conservation Board Act* (NRCBA), and the *Responsible Energy Development Act* (REDA). In the case of the Pathways Project, REDA would be the applicable legislation. Under this legislation, only specific individuals or groups who are directly affected by a project are granted standing to participate in the assessment and decision-making process.

Government officials and courts have interpreted "directly affected" narrowly to require an individual's or group's interests to be personally, directly, and adversely affected by a project to participate, for example a person with property rights that the project directly will harm. By contrast, the federal process under the IAA is not limited to those directly affected by a project. The IAA requires that the public be given an opportunity to meaningfully participate in an assessment (s. 27) and that public comments be considered in the assessment (s. 22(1)(n)).

Given that CO₂ pipeline ruptures create a "hazard zone" (See Appendix 1) of over 20 kilometres during explosions or leaks, it's crucial that community members be given a chance to voice their opposition to or questions about the project.

Furthermore, the project has many potential adverse impacts on matters within federal constitutional jurisdiction such as fisheries, migratory birds, species at risk, transboundary waters, and Indigenous peoples. Provincial assessments and other legislated processes cannot be as fulsome and robust as a federal assessment when considering these matters. The federal government has the laws, policies, major expertise, staff, infrastructure, and interest in seeing that these matters are well-managed in line with federal expectations.

On March 18, 2026, Nigel Bankes, emeritus professor of law at the University of Calgary, [published his assessment](#) of the Draft Cooperation Agreement, which reinforces many of the concerns we have listed above. In his conclusion, Bankes states:

*“...the agreement places far too much faith in provincial impact assessment and regulatory processes that many consider to be inadequate – both in terms of substance and rigour and in terms of opportunities to participate. The terms of co-operation must also respect statutory obligations and in this case, the deference that the s 1.1 agreement requires Canada to accord to Alberta’s environmental and regulatory processes looks like an abdication of federal responsibility without the means to ensure that Alberta’s regulatory processes will protect federal interests. While this same criticism can also be levelled at the co-operation agreements with other provinces, I think it is clear that **the draft Alberta agreement takes federal abdication to new heights.**”*

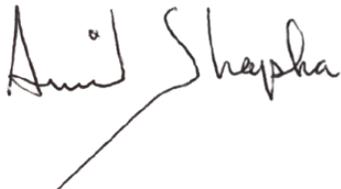
With respect to the inherent, constitutional, and treaty rights of Indigenous communities in Alberta (and across Canada), Hayden King, Executive Director of the Yellowhead Institute [states](#) that the duty to consult with First Nations is typically triggered via the environmental impact assessment process, and that this Cooperation Agreement:

“...will make the approval process much quicker — though it means less diligence on environmental and Indigenous issues and less oversight from the federal government, which has certain constitutional obligations that provinces don’t.” King adds: “While in most of the Cooperation Agreements, Canada, and the provinces agree to some variation of “affirming commitment to UNDRIP” in Alberta’s agreement, the province declares that it “views UNDRIP as non-binding” — a signal that Alberta intends to undo any gains that have been made to ensure Indigenous participation in decision-making.”

Concluding Remarks

Given that the Pathways Project has been included as one of the four projects listed in the Canada-Alberta MOU, and as community members who will be directly impacted by this project, we are demanding that the Pathways Project undergo a comprehensive federal environmental impact assessment. For the health and wellbeing of our communities, we are urging you, as the responsible minister, to immediately resume the existing (suspended) federal IAA process, and to abandon your proposal under the Draft Cooperation Agreement to defer to Alberta on impact assessments.

Sincerely,

A handwritten signature in black ink that reads "Amil Shapka". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Dr. Amil Shapka
Concerned resident from the County of St. Paul
Co-founder, No CO₂ Pipelines Alberta

Appendix 1. Oil Sands Alliance "Pathways Project" – CO₂ Pipeline Failure Hazards Map

Note: Pipeline map is based on pipeline segment applications submitted to the AER as of Dec. 19, 2025.

