



Alternatives North

The Honourable Jay MacDonald
Minister of Environment and Climate Change
Government of the Northwest Territories

September 28, 2026

Dear Mr. Minister MacDonald:

Alternatives North members are deeply concerned about the endorsement by the Alberta Energy Regulator (AER) of the plan by Suncor to release tailings from its vast toxic tailings ponds into the Athabasca River. We urge you to take action; to do everything in your power to stop the practice before it begins. There is no scientific proof the treatment process being used in the industry will render the tailings safe, and, predictably, the other seven giant industrial corporations mining oilsands, each with their own massive lakes filled with toxic tailings near Fort McMurray, will be allowed to follow the same practice, dumping their “treated” toxic soup into the river, contaminating the whole Mackenzie River watershed.

The process being used for the treatment of the tailings is “nanofiltration and membrane technology.” No proof has been given that the process sufficiently renders the tailings safe for humans, nor for the aquatic biosphere. Indeed, in our investigations of the reports to the AER (on their website) by all the oilsands industry corporations in their required annual reporting regarding the status of their tailing and the toxins in them, each year from 2022 to 2025 the reports all declared the technology for cleaning the tailings “is improving.” Ergo, the technology being used to “clean” the tailings, removing the toxins, metals, polycyclic aromatic hydrocarbons (PAHs), salt and sediment, is obviously still evolving, still not perfected. That is not good enough when it comes to peoples’ drinking water. No evidence is ever given in those reports that the treated tailings are completely clean and safe. No evidence is ever offered that the treatment process removes all harmful toxins and metals.

The letter to Suncor from the AER Specialist in Regulatory Affairs (attached), dated July 16, 2026, states as a heading: “Environmental Impact Assessment Report Not Required.”

In the body of the letter it states: Suncor’s project “....is not a mandatory activity for purposes of environmental assessment.”

That from an organization that espouses on its website under the heading WATER, “Protecting the environment, including water, is part of the AER’s mandate. Any energy or mineral resource development project that involves water is under our authority.”

The NWT Government needs to act swiftly to head off this terrible plan. The primary tools for that endeavor would likely be the Mackenzie River Transboundary Waters Master agreement, signed with Alberta in 1997, as well as the Mackenzie River Basin Bilateral Water Management Agreement signed by NWT and Alberta in July 2015.

Dumping the effluent into the Mackenzie Basin Watershed (Athabasca River) would violate key terms of the 2015 agreement:

1. Failure of prior notification: The agreement mandates early, transparent, and proactive communication with the NWT regarding any activities, regulatory changes, or industrial incidents that could impact shared downstream waters.
2. Breach of the primary principle of ecosystem protection: The core objective of the agreement is to maintain the ecological integrity of transboundary waters, ensuring that downstream water quality, biological diversity, and ecosystem health are not degraded by upstream industrial activities.
3. Exclusion of Indigenous Governance and Rights: The bilateral agreement commits both jurisdictions to respecting Indigenous rights, incorporating Traditional Knowledge, and involving affected First Nations, Métis, and Inuit communities in transboundary water management.
4. Erosion of trust and bilateral good faith: Beyond specific technical standards, transboundary management relies on mutual trust between jurisdictions: Proceeding with tailings water release plans that are not adequately studied or vetted violates the very essence of the agreement, turning a shared stewardship partnership into an asymmetric regulatory relationship.

Minister MacDonald, it is already well documented that the primary source of pollution from the oilsands industry emerges from the smokestacks at each of those massive industrial sites, and that pollution, including a range of toxic materials, is deposited on the land. That affects the animals, and plants that are harvested, to the point they may not be safe to eat.

The toxins deposited on the land are washed onto rivers during rainfall events and from the spring snowmelt. Few studies have been done on the impacts of that toxic pollution and it seems to be ignored by the Alberta Energy regulator. That includes no health study on the impact on the people immediately downstream living in Fort McKay and Fort Chipewyan, yet there are reported to be a high number of deaths from cancer, including the occurrence of rare cancers, in those communities, despite the tiny population.

Now the AER has endorsed the plan whereby the oilsands companies can get rid of the problem of the massive toxic tailings lakes by, after a treatment regime, releasing them into the Athabasca River, adding their effluent to that existing level of contaminant pollution.

Human Exposure: Downstream communities draw drinking water from the Peace-Athabasca Delta and Lake Athabasca, Slave River and Great Slave Lake, all of which are going to be subject to the impact. Conventional municipal water treatment plants are designed to treat microbial pathogens and suspended solids, not complex industrial organic mixtures like naphthenic acids. Even if acute human toxicity is mitigated, chronic low dose exposure through the consumption of foods common in the traditional indigenous life-style (consumption of local fish and wildlife) remains a major epidemiological concern due to heavy metal bioaccumulation. Mr. Minister, there are currently no finalized regulatory effluent limits specific to oil sands tailings water discharge. The impact of adding partially treated tailings pond fluid will add measurably to the toxin load already carried downstream by the river waters. This cannot be allowed to happen. We urge you to do everything in your power to stop it before it starts.

Sincerely,

Ben McDonald
For Alternatives North

Considerations:

Since Jan 1, 2026, Suncor Energy has reported a total cumulative net profit (adjusted earnings) of \$6.1 Billion. Beginning in August 2026, Suncor plans to increase monthly share repurchases to \$500 million per month, from \$350 million per month.

American institutional investment companies own the largest percentage share of Suncor Energy stock at 36%. Canadian institutional investment companies own the second largest percentage at 28%. Retail investors (ordinary stock holders) from around the world, including the USA, hold 30% of the stock.

If released under potential future regulations, human health risks will depend on **treatment efficacy, monitoring rigor, and bioaccumulation mechanics**. The key chemical constituents of concern stored in tailings ponds include:

Chemical Category	Specific Contaminants	Potential Risk / Mechanism
Organic Acids	Naphthenic Acids (NAs)	Cytotoxic and endocrine-disrupting properties; primary driver of aquatic toxicity. Hard to completely strip without membrane processes.
Heavy Metals	Arsenic, Cadmium, Lead, Mercury, Vanadium	Neurotoxic and carcinogenic potential. Bioaccumulates up aquatic food webs (e.g., predatory fish in Lake Athabasca).
Polycyclic Aromatic Hydrocarbons (PAHs)	Alkylated PAHs, Benzenes	Carcinogenic and mutagenic compounds. Require advanced oxidation or granular activated carbon (GAC) for total removal.
Salts / Inorganic Ions	Sodium, Chlorides, Sulfates	Toxic to freshwater flora and fauna; less direct threat to humans at low concentrations, but damages aquatic ecosystems.