



Appendix A

**Aggregate Development in Alberta -
ASGA Environmental Regulation Process Review
Private Lands**

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1.0 Introduction

Aggregate development on private land has been regulated by Alberta Environment and Parks (AEP) since 1978 through various pieces of legislation including permitting under *Land Surface Conservation and Reclamation Act* (1978 – 1993), the *Environmental Protection and Enhancement Act* (EPEA) (1993 – 2004), and the *Code of Practice for Pits* (2004 - present).

The transition from the Approval process under EPEA to the Registration process under the *Code of Practice for Pits* was completed to streamline the application review process for aggregate development on private land. However, over time, the registration application process has become more complicated than what is set out in the *Code of Practice for Pits*, with inconsistent and unpredictable requirements. This trend has led to regulatory uncertainty for sand and gravel operators.

The Alberta Sand and Gravel Association's (ASGA) Land and Environment Committee is comprised of sand and gravel applicants and environmental consultants. The committee reviewed the current regulatory process under the *Code of Practice for Pits* to identify constraints with the environmental regulatory process that are leading to regulatory uncertainties. Recommendations to resolve some of the observed and experienced limitations have been highlighted in this report.

It should be noted that the development of pits within Alberta is subject to many other regulations and rules governed by other regulatory agencies, including municipal, provincial, and federal. The focus of this review was on the regulatory process required under the *Code of Practice for Pits*, and while it may speak to municipal permitting items and the *Water Act*, this review does not cover these processes in detail.

2.0 Regulatory Requirements

Under the *Code of Practice for Pits*, there are four main approval/reporting activities that occur throughout a pit's life cycle, including:

- Development and submission of an application under the *Code of Practice for Pits* often referred to as a *Code of Practice for Pits* application or to obtain a Registration.
- Submission of Updated Activities Plans for all operational changes.
- Ongoing Five-Year reporting until a Final Reclamation Report is submitted, along with updated security estimates every five years.
- Development and submission of a Reclamation Certificate Application.

The following sections provide a breakdown of each of these stages.

2.1 Registration Process under the *Code of Practice for Pits*

The Registration process involves preparing an Activities Plan/ *Code of Practice for Pits* Application to develop portions of private land for aggregate extraction. As shown in **Figure 1** on page 4, the general process involves:

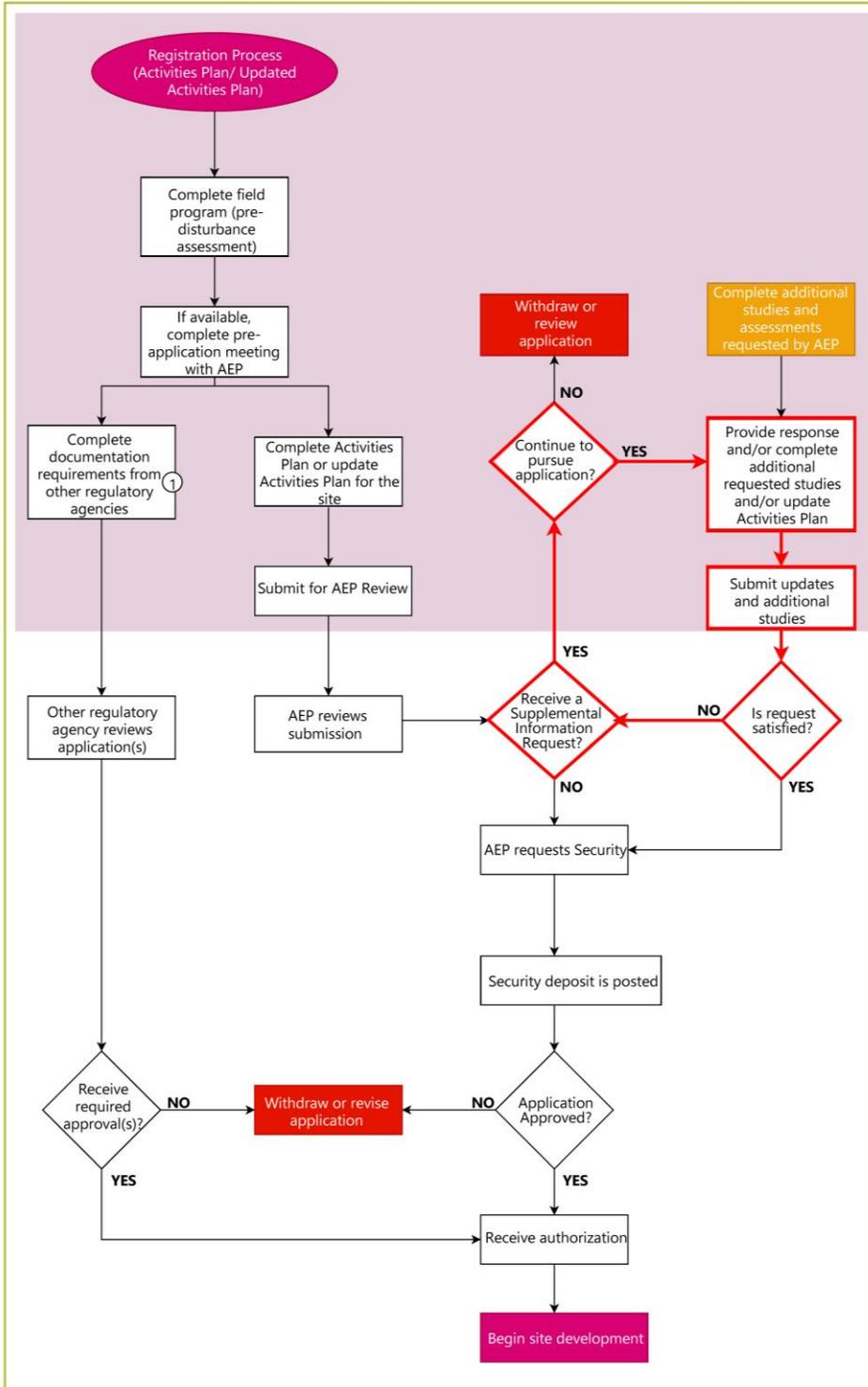
1. Conduct a pre-disturbance assessment of the proposed pit area.
2. A pre-application meeting with AEP representatives, if they are willing to meet and discuss the proposed operation.
3. Prepare and file an application that includes operation and reclamation plan details and a security estimate, representing the maximum conservation and reclamation costs by a third-party (typically represents the maximum liability within the first five years).
4. AEP coordinator(s) and subject matter expert(s) review the application and provide a Supplemental Information Request (SIR) to the applicant, generally with a 30-day response timeline for the applicant, or the application will be withdrawn.
5. Following a response to the SIR(s), the applicant may receive subsequent SIRs until the coordinator(s) and director are satisfied.
 - *In some cases, the SIR may be too onerous for the applicant, and the applicant may choose to withdraw the application; this can occur at the first receipt of a SIR or following numerous requests from AEP.*
6. Financial security is requested, presumably when the review and request for SIR(s) are complete. AEP indicates a timeline of 30 days to post financial security; if security is not posted within this timeframe, the application may be withdrawn.
 - *It should be noted that some ASGA members have experienced receiving additional SIR(s) after the security has been requested/paid.*
7. Security is posted by the applicant.
8. AEP issues a decision – either issuing a registration or rejecting the application.
 - *It is not clear if AEP will proceed with requesting financial security as outlined in step six if the decision will be to reject the application for registration.*

Aggregate Development in Alberta
 ASGA Environmental Regulation Process Review – Private Lands

Figure 1

Figure 1 - Registration Process Mapping & Updated Activities Plan Process Mapping

Aggregate Development in Alberta ASGA
 Environmental Regulation Process
 Review – Private Lands



① Potential requirements from AEP and other regulatory agencies, include but are not limited to:

- Municipal Rezoning Application
- Development Permits
- Water Act Authorization
- Transportation Proximity Agreements/ Roadside Development Permit
- Traffic Impact Assessment
- Historical Resource Clearance - HRIA, Archaeological, Palaeontological, Aboriginal traditional use, etc.
- Environmental Noise Impact Assessment
- Geotechnical Assessment
- Surface Drainage Assessment, etc.

2.1.1 Statistics and Timelines

Timelines vary throughout the province based on location and demand. Based on ASGA member polls, timelines for applications range from one year to seven years for a decision to be received on an application.

Some industry members noted timelines are typically extended in the North Saskatchewan - Red Deer Region and the South Saskatchewan River Region. This could be partially attributable to additional *Water Act* requirements that delay issuance of the Registration. Faster timelines are reported in the Peace Region, where the applications are reviewed at the same time as any associated applications under the *Water Act* by the same reviewer.

Table. 1 – Experienced Timelines for Registration Process Based on Region

Region	Experienced Timelines
Upper Athabasca Region	Highly variable Min: 1.5 years Max: 7 years
Lower Athabasca Region	Relatively Consistent Min: 12 months Max: 18 months
Peace Region	Consistent Min: 6 months Max: 1 year
North Saskatchewan – Red Deer Region	Highly variable Min: 1 year Max: 7 years
South Saskatchewan River Region (Calgary)	Highly variable Min: 1 year Max: 7 years
South Saskatchewan River Region (Lethbridge)	Moderately variable Min: 1 year Max: 3 years

2.1.2 Constraints with the Registration Process

Timelines

Review timelines are generally increasing. Previous efforts to create an accepted practice for the application review timelines between AEP and ASGA has not been maintained. Application review and processing targets from 12 to 28 weeks have now extended to 12 to 36 months at best, with many applications exceeding this timeframe. This appears to be a result of:

- Insufficient staffing resources. For example, it is understood that there is currently no full-time permanent employee assigned to review pits for the northern portion of the North Saskatchewan – Red Deer Region, an area that experiences a high volume of applications.
- Insufficient training for personnel to ensure a consistent approach to reviewing applications and issuing SIRs.
- Treating the review similarly to an industrial approval application rather than a Code. Operators have experienced faster review timelines for industrial approvals for other project types than the review under the *Code of Practice for Pits*.
- Lack of Communication. Quite often, AEP representatives are not willing to meet with applicants before submission to ensure the application meets expectations.
- Changing requirements and standards either internally by the designated director, or by internal policy, which is then not communicated to the industry proactively.
- Lack of review coordination:
 - Application coordinators do not issue referrals when they get applications, but rather the application sits in a queue and then is referred out at a later date. It has also been noted that subject matter experts are not receiving the full application or coordinators are not reviewing subject matter experts' comments or questions before sending them to the applicant, resulting in SIRs that are addressed in the application or have been previously answered.
 - In many cases, *Code of Practice for Pits* applications are made at the same time as *Water Act* applications, and in most cases, these reviews are completed independently of one another and lack coordination. This can lead to various delays, along with receiving competing requests.
- Inconsistent approaches and standards regionally.
- The regional disparity of a number of applications distributed across the province.
- Applications can be put on hold while waiting for the municipal permitting process or other regulatory authorizations. This can result in a chicken and egg scenario as both regulatory bodies may refuse to be the first party to issue an authorization.

Inconsistency in Requirements

Director discretion tends to lead the process resulting in inconsistent approaches to the review and request for information across the province. In many cases, the requirements are inconsistent, inappropriately applied, and poorly communicated.

Inconsistencies can take the form of:

- Reviewer and/or director pre-disturbance assessment expectations are not always shared in advance and can change without notice. Different coordinators and directors have different expectations that can lead to increased/unforeseen costs.

- Distances of areas of interest/concern from the proposed development for which impact assessments are required can vary from office to office.
- Subject matter experts seem to have unlimited discretion to request additional studies/assessments that do not always appear to be linked to regulatory requirements.
 - *Often AEP cannot link regulatory requirements or provide rationale other than 'directors discretion' when asked about additional requirements.*
- The view by coordinators that a SIR has to be issued for every application, regardless of completeness.
 - *This creates a double standard for a complete comprehensive application versus an incomplete application, which can create an unfair playing field amongst competitors.*

2.1.3 Proposed Recommendations

The following recommendations have been provided for consideration.

- Implement mandated timelines for all applications under the *Code of Practice for Pits* similar to the Department of Fisheries and Oceans, the Alberta Energy Regulator, Natural Energy Board, or the Alberta Utility Commission. Mandated timelines should include the process of requesting internal referrals.
- Consider the development of an Aggregates Unit with one designated director to review all pit aggregate applications under the *Code of Practice for Pits* and the *Water Act* in order to distribute the work across the province. Alternatively, assess staffing capacity and ensure appropriate staffing availability for all regions.
- Improve staff (director and reviewer) training to ensure a better understanding of the industry and requirements.
- Develop an internal subject matter expert referral process (including setting expectations/ timelines on when referrals are sent and received).
- Increase communication internally to ensure consistency, externally to set expectations, and individually between applicants and AEP frontline staff.
- Hire temporary staff with the knowledge to assist with backlog. Consider hiring a consulting firm or seconding individuals with provincial experience.
- In collaboration with ASGA, develop a risk-based approach to streamline the permitting process to meet mandated timelines.
- Standardize the format of how SIRs are issued and ensure that SIRs are based on regulatory requirements that link back to the applicable regulation when sent to the Operator.
- Streamline reviews between pieces of legislation (e.g. *Code of Practice for Pits* and WA or SML and WA). Security should not be requested until all permits are ready to be issued.
- Maintain jurisdictional independence. AEP should not interfere in other jurisdictions, nor allow municipalities to interfere with theirs, nor require visible proof of municipal permits before reviewing/approving applications.

2.2 Updated Activities Plans Process under the *Code of Practice for Pits*

Updated Activities Plans (UAP) are required for a change to the previously registered Activities Plan. Typically, the purpose is to adjust the mine plan or pit boundary, change an activity (e.g. import material, add washing, dewatering), and/or improve the proposed end land use.

The review process for a UAP is similar to the *Code of Practice for Pits* registration process and has experienced related delays, as previously noted.

As shown in **Figure 1**, on page 4, the general process involves:

1. Conduct a pre-disturbance site assessment according to site features (typically only required for expansions into new areas).
2. A pre-application meeting with AEP representatives if they are willing to meet and discuss the proposed operation, and if the change is complex enough to warrant.
3. Prepare and file a UAP and a revised reclamation financial security estimate.
4. AEP coordinators and subject matter experts review the application and provide SIRs to the applicant, generally with a 30-day response timeline for the applicant or the application will be withdrawn.
 - *In some cases, the SIR may be too onerous for the applicant, and the applicant may choose to withdraw the application; this can occur at the first receipt of a SIR or following numerous requests from AEP.*
5. Following a response to a SIR, the applicant may receive subsequent SIRs and continue until the coordinator(s) and director are satisfied.
9. Financial security is requested, presumably when the review and request for SIRs are complete. AEP indicates a timeline of 30 days to post financial security, and if security is not posted within this timeframe, the application may be withdrawn.
 - *It should be noted that some ASGA members have experienced receiving additional SIRs after the security has been requested/paid.*
6. Security is posted by the applicant.
7. AEP issues decision – either issuing a registration or rejecting the application.
 - *It is not clear if AEP will proceed with requesting financial security as outlined in step six if the decision will be to reject the application for registration.*

2.2.1 Statistics and Timelines

Review timelines are generally increasing, even for a simple UAP that could be a letter notification.

It has been noted report timelines are typically extended due to the various changing requirements of the *Water Act*, and how it is applied to historical operations that were previously authorized.

Table. 2 – Experienced Timelines for Updated Activity Plan Process Based on Region

Region	Experienced Timelines
Upper Athabasca Region	Highly variable Min: 1.5 Years Max: 5 years
Lower Athabasca Region	Relatively Consistent Min: 6 months Max: 12 months
Peace Region	Consistent Min: 3 months Max: less than 12 months
North Saskatchewan – Red Deer Region	Highly variable Min: 1 Year Max: 5 years
South Saskatchewan River Region (Calgary)	Highly variable Min: 2 years Max: 5+ years
South Saskatchewan River Region (Lethbridge)	Moderately variable Min: 1 year Max: 2+ years

2.2.2 Constraints with the Updated Activities Plan Review Process

1. Timelines

Review timelines are generally inconsistent and increasing, even for simple UAPs that could be a letter notification. It can be difficult for an operator to predict years in advance that they will need to revise the mine sequencing or relocate stockpiles.

However, it is expected that to stay compliant, these changes need to be filed and approved before they are executed at the pit. This limits an operator from being flexible in operating their business. Operators generally agree that complex changes such as adding washing or expanding to new areas require a more fulsome review. However, simple changes that do not affect the

overall disturbed area or ultimately change activities, such as relocating stockpiles or deciding to one mining block before another should not require a full application with a 12-month review. Timeline impacts are the result of:

- Treating the review of the UAP as a new stand-alone application, and not considering the history and previous authorizations issued.
- Insufficient staffing resources and inconsistent distribution of applications throughout the province.
- Requests for minor deviations to be reported as contraventions. In many cases, applications are put on hold until the item is called in or compliance has looked into the concern identified.
- Applying new requirements on historically approved disturbances, such as requiring a *Water Act* approval for end pit lakes previously approved before the *Water Act* requirement. This can delay UAP reviews while operators are trying to “catch up” with new requirements that were not in force when their operations were initially approved.
- Lack of Communication. Quite often, AEP representatives are not willing to meet with applicants before submission to discuss how changes proposed to a permitted operation is going to be processed by AEP.
- Changing requirements and standards either internally by the designated director or by internal policy, that is then not communicated to the industry proactively.
- Lack of review coordination:
 - Application coordinators do not issue referrals when they get applications, but rather the application sits in a queue and then is referred out at a later date. It has also been noted that subject matter experts are not receiving the full application or coordinators are not reviewing subject matter experts’ comments and/or questions before sending them to the applicant. This results in SIRs that are addressed in the application or have been previously answered.
 - In many cases, *Code of Practice for Pits* applications are made at the same time as *Water Act* applications, and in most cases, these reviews are completed independently of one another and lack coordination. This can lead to various delays, along with receiving competing requests.
- Inconsistent approaches and standards regionally.
- The regional disparity of a number of applications distributed across the province.
- Applications can be put on hold waiting for the municipal permitting process or other regulatory authorizations. This can result in a chicken and egg scenario as both regulatory bodies may refuse to be the first party to issue an authorization.

2. Inconsistency in Requirements

Director discretion tends to lead the process resulting in inconsistent approaches to the review and request for information across the province. In many cases, the requirements are inconsistent or inappropriately applied.

Inconsistencies can take the form of:

- Applying current standards on previously permitted activities.
- Pre-disturbance assessment requirements are not always known in advance and can change without notice. Different coordinators have different expectations that can lead to increased/unforeseen costs.
- Subject matter experts seem to have unlimited discretion to request additional studies/assessments that do not always appear to be linked to regulatory requirements.
 - *Often AEP cannot link regulatory requirements or provide rationale other than 'directors discretion' when asked about additional requirements.*

2.2.3 Proposed Recommendations

In addition to the recommendations outlined in section 2.1.3, the following recommendations have been provided for consideration as it pertains to the UAP process.

- Consider allowing a simple UAP to be treated similar to filing a 'Notification of Change' that one would do with approval under Section 67 (3)e of EPEA, or prepare a risk matrix to guide streamlining the review. Items considered as a simple update would be things that do not include substantial changes to the pit boundary or add drastically new processes.
- Where a more in-depth review is needed for significant changes (expansion or new process like adding washing), a timeline in which a decision is made should be mandated (12 months would be reasonable for this).
- The development of a simple evaluation for risk management of the perceived 'non-compliance' for environmental and/or adverse impact would likely reduce the workload during a review of UAPs. In consideration of a department that appears to be so overwhelmed, requests for ridiculously bureaucratic self-reporting for things extremely minor are requested from reviewing coordinators creating compliance records and additional costs for operators, but also additional work for the Environmental Response Centre, compliance, and approvals departments within AEP.

2.3 Five-Year Reporting and Final Reclamation Report Process under the *Code of Practice for Pits*

Five-Year Reports are submitted every five years after the original registration issuance date until a Final Reclamation Report is sent, or a Reclamation Certificate is issued (whichever comes first).

The Five-Year Report provides baseline details on the current disturbance and status of the pit. At the request of AEP, the Five-Year Report also includes a revised security estimate as per Section 3.3 of the *Code of Practice for Pits*.

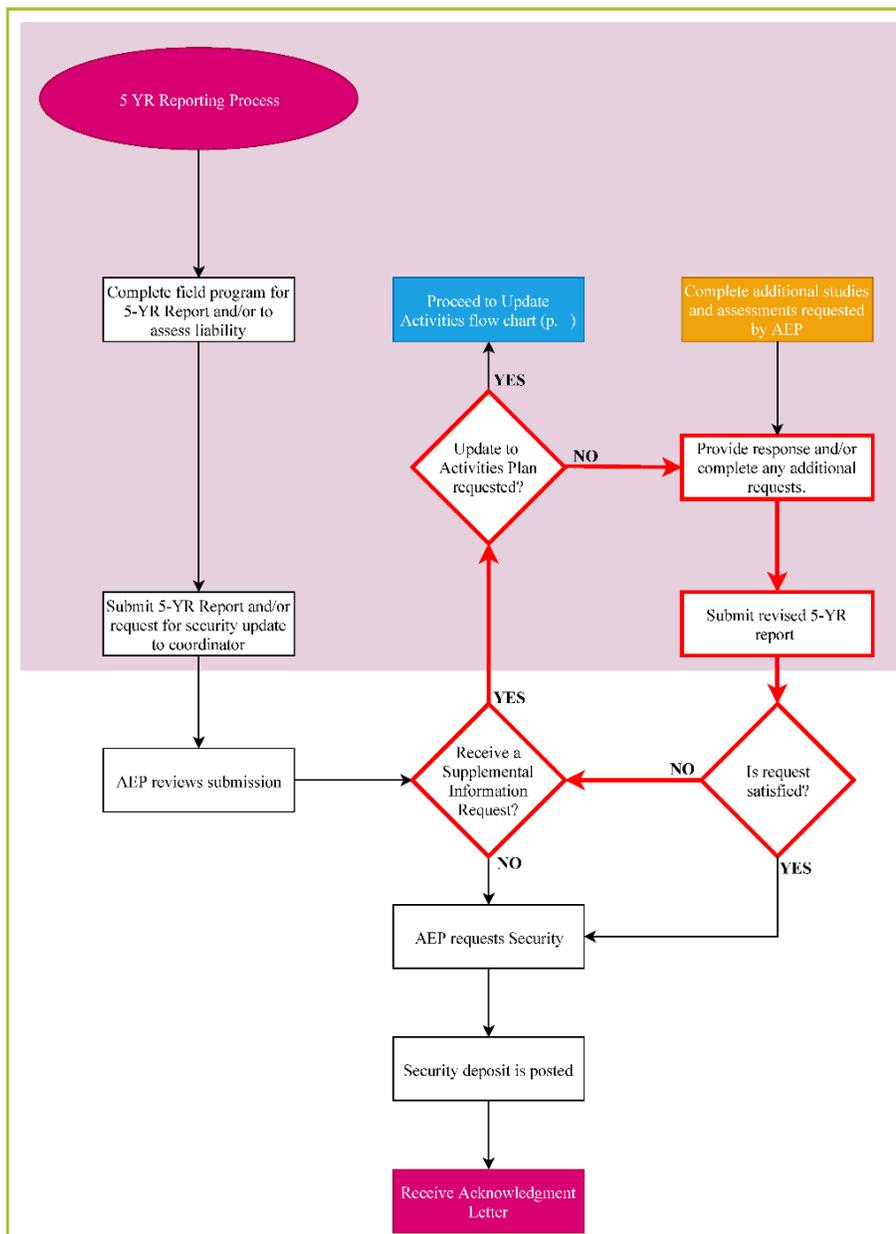
As shown in **Figure 2** below, the process for Five-Year Reporting generally involves:

1. If a pit is operational, an onsite assessment to determine pit conditions is conducted.
2. The Five-Year Report, along with a revised security estimate, is submitted.
3. AEP reviews and may issue a SIR and/or request a UAP if there are significant deviations from the original approval.
4. AEP requests a revised financial security instrument (letter of credit/cash/bond).
5. AEP issues a letter acknowledging a Five-Year Report was submitted.
 - *It should be noted that as per the Code of Practice for Pits, AEP response is not required in order to continue operations as per the Registered Activities Plan.*

Figure 2

Figure 2 - Five-Year Reporting Process

Aggregate Development in Alberta
 ASGA Environmental Regulation Process
 Review – Private Lands



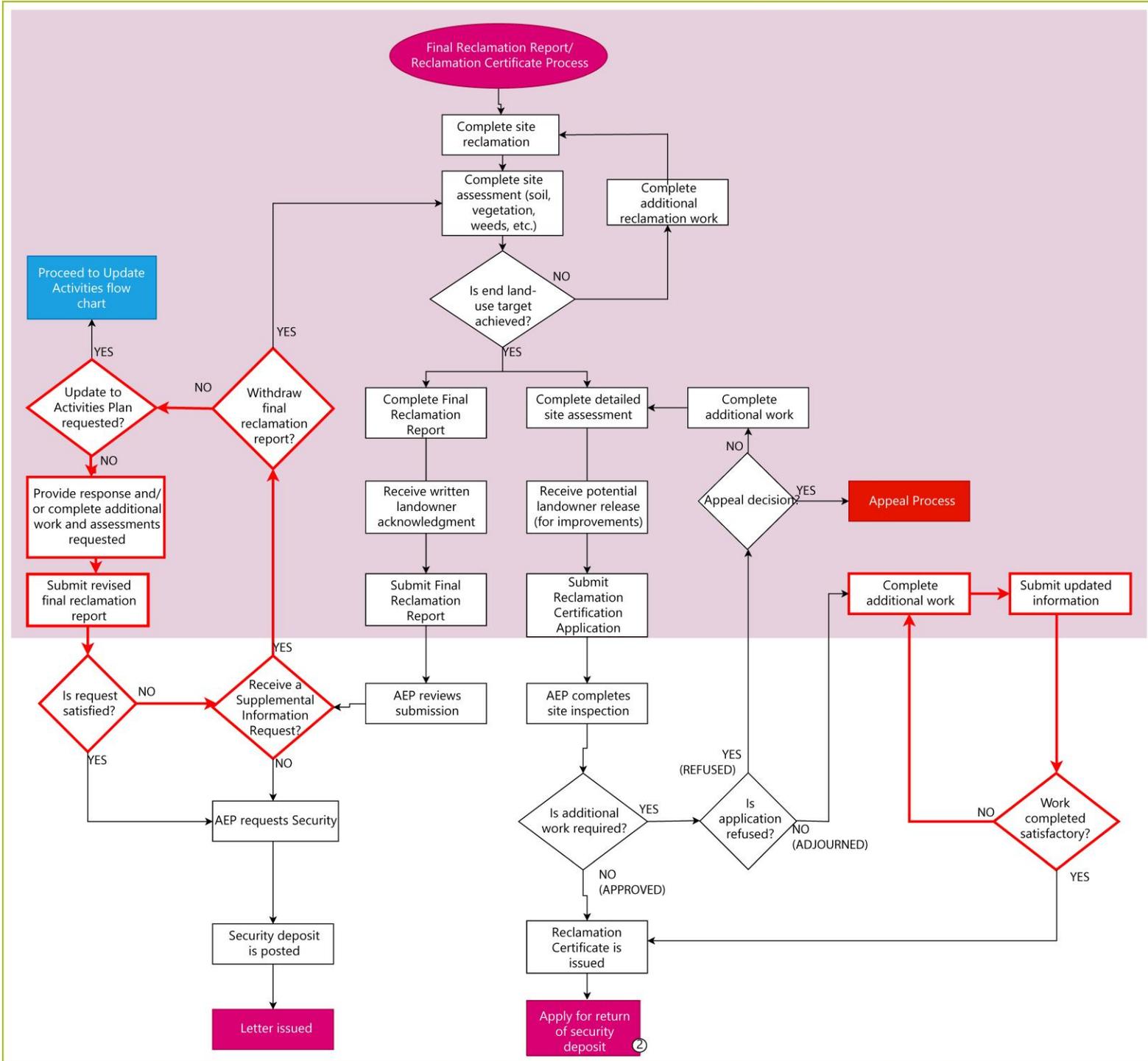
A Final Reclamation Report is submitted no later than three years after the entire pit has been revegetated. The *Code of Practice for Pits* notes that this report is not required if a reclamation certificate has been obtained. It should be noted that while the submission of the Final Reclamation Report concludes the requirement for Five-Year Reports, revised security estimates are still required to be updated every five years as per Section 3.3 of the *Code of Practice for Pits*.

As shown in **Figure 3** on the following page, the process for the Final Reclamation Report process generally involves:

1. A preliminary or detailed site assessment to determine reclaimed pit conditions.
2. The Final Reclamation Report, along with a revised security estimate, is submitted.
3. AEP reviews and may issue a SIR and/or request a UAP.
4. AEP requests a revised financial security instrument (letter of credit/cash/bond) or returns a portion of financial security.
5. AEP issues a letter acknowledging the Final Reclamation Report was submitted.

Figure 3

Figure 3 - Reclamation Certification Process



2 Currently a case-by-case basis. Not all proponents are required to apply for the return of their security; in certain cases, the security deposit is simple returned once Reclamation Certification is issued

2.3.1 Statistics and Timelines

Average timelines for Five-Year Report reviews across all regions were reported to be between one to two years, while many operators have experienced reviews that have been completed within three months or up to five years of the submission.

During the development of this report, there was limited experience with the Final Reclamation Report process; however, a review of six months processing time was noted by one member of the committee.

2.3.2 Constraints with the Five-Year Report and Final Reclamation Report Review Process

1. Timelines

When there have been delays in the review of a Five-Year Report, AEP often requests that the Five-Year Report be revised to provide the status of the pit at the time of analysis. This could include the request to fly the pit with an unmanned vehicle, re-delineate disturbance areas, provide details on reclamation soil depths and vegetation density, and/or update the financial security calculations to the current disturbance and projected forecasting. These unusual requests result in unexpected costs that are not warranted, as the Five-Year Report is supposed to represent the pit status at the five-year mark and not at the time the reviewer may get around to looking at it.

Several instances were reported in which Five-Year Reports were rejected because the report was not submitted within 60 days of the issuance anniversary, even though the report was submitted after the operating season or with confirmation that the conditions at the site had not changed since the last submission.

In these cases, AEP staff requested that information be re-submitted within 60 days of the five-year anniversary date, resulting in duplication of work often when conditions are not favourable to providing meaningful data (i.e. anniversary dates in the winter such that imagery is during snow conditions) or duplication of work/costs for data that has not changed.

2. Security Reductions

As pits progress in operations, or when an operation is close to closure with a majority of the disturbed area being reclaimed, the reclamation liability can be greatly reduced. When this happens, operators have the opportunity to reduce their financial security through the Five-Year Report process or the Final Reclamation Report. In recent years, financial security reductions have been issued intermittently with no standard approach provincially regarding when and how the security could be reduced.

2.3.3 Proposed Recommendations

- Streamline the review approach as a status update rather than a formal review. Additional data outside the scope of Schedule 4 Part 1 should not be requested.
- Limit SIRs to the base requirements as outlined in the *Code of Practice for Pits*.
- Provide allowances for consideration and/or logical approaches to allow for submissions prior to 60 days of the anniversary date.
- Following or during submission of the Final Reclamation Report, allowing for the ability to reduce security should be considered. If reducing to full third-party costs is not favourable, consider determining a pre-set rate once the Final Reclamation Report is submitted.

2.4 Reclamation Certification Process under the *Code of Practice for Pits*

Upon completion of the reclamation of a pit, operators can apply for a Reclamation Certificate once the vegetation has successfully established (common practice is to apply following one to two years of successful vegetation growth) and/or equivalent land capability has been achieved.

Reclamation certification allows operators to remove a liability from their books, in addition to being able to have their financial security returned, which frees up cash flow or their borrowing capital. Currently, there is no guidance documentation produced by AEP that sets forth the expectations for a Reclamation Certificate application. Operators may hire consultants to prepare and submit applications or will prepare and submit the application in house.

The typical Reclamation Certification process involves:

1. The operator reclaims the site, and when conditions have stabilized and an equivalent land capability has been achieved (typically when vegetation cover is achieved), a detailed site assessment is completed.
2. If the information gathered during the detailed site assessment confirms that equivalent capability has been achieved a Reclamation Certificate Application is prepared that can include supporting information on how equivalent land capability was determined/achieved, landowner releases, history of the site (including authorizations and operating history), and additional permitting if a change in land use has occurred.
3. Upon receipt of a submission, AEP invoices the applicant a \$300.00 application fee. This often occurs months after the submission.
4. After applying, a reclamation inspector from AEP will review and may send SIRs before an inquiry.
5. AEP schedules an inquiry (site visit) to assess reclamation success and alignment with the approved reclamation plan.
6. AEP issues a Reclamation Certificate or adjourns the inquiry or rejects the application if deficiencies are observed. If adjourned, the operator must provide the additional

information requested or complete additional work on-site in order to be reconsidered for a reclamation certificate.

7. Financial security is returned once the Reclamation Certificate is issued.

2.4.1 Statistics and Timelines

There are no mandated timelines for AEP to review and assess reclamation success after receiving a Reclamation Certificate application. Historically, reclamation inquiries have been held following the first growing season after submission. However, in 2019, Reclamation Certificate applications in many regions across Alberta have been deemed a low priority for AEP, and applications are not being assessed/reviewed at this time.

2.4.2 Constraints with the Reclamation Certification Process

1. Timelines

Delays in issuing Reclamation Certificates and the return of security can impact operators' borrowing capital as money is tied up in security funds. While operators could request a reduction in security, these requests are rarely accepted.

Additional delays leave many operators holding encumbrances on land which they do not own and are no longer actively operating in, resulting in potential monetary penalties with landowners or affecting the ability to sell properties no longer in operation.

Continued delays in processing the Reclamation Certificate applications will ultimately result in a backlog of applications, exacerbating the issue.

2. No Formalized Application Process or Guideline

There are no provincial guidelines as to what is required in a Reclamation Certificate application. Because the industry does not know what to provide, the range of submissions could have a varied acceptance of completeness. The unknown expectations make it difficult for the industry to understand how to budget for costs to prepare an application, and also lead to uncertainty as to whether or not the applications being prepared are sufficient.

With no formalized process, changes to the program are constant. For example, security releases have changed without notice. Operators must apply to have financial security returned following a Reclamation Certification being issued. This creates another administrative process for AEP and industry. Previously, the return of financial security was initiated by AEP/reclamation inspector following the issuance of a Reclamation Certificate.

3. Landowner Requests/Change of Land Use

Due to the length of operations and landowner/operator relationships, often features are left on the landscape at the request of the landowner (e.g. access roads, approaches, gravel pads, reject

material). Often landowner releases are not sufficient to allow the Reclamation Certificate to be issued. In many cases, if the reclamation plan varies, AEP may delay issuance or consideration of a Reclamation Certificate until the pit operator submits and receives authorization of a UAP or *Water Act* Approval. This appears to be causing an unnecessary burden on a review process that is already at capacity, rather than dealing with the change through the Reclamation Certificate process.

2.4.3 Proposed Recommendations

- Reassess the priority of the Reclamation Certificate application reviews and ensure they are continually reviewed to avoid a backlog of applications.
- Streamline AEP's internal review and requirements for issuance of Reclamation Certificates.
- Develop a framework or guideline on the requirements for a Reclamation Certificate application along with timelines.
- Modify the current Reclamation Certificate process to be consistent with resources (e.g. adopting the upstream oil and gas model for Reclamation Certificates and perform audits instead of reviewing and inspecting every site when an application is prepared by a ¹qualified professional).
- Once a Reclamation Certificate is issued, security should be returned automatically.

¹ Where appropriate (Qualified professionals should not be an automatic requirement or expectation for all applications by AEP, but only after site specific determination between all affected parties), qualified professionals will be engaged by applicants. When that occurs, meaningful dialogue between the applicant, their professional and the reviewers should be preferred over the traditional SIR method. Increased involvement by subject matter professionals should assist / expedite the review process, not slow it down.

Aggregate Development in Alberta
ASGA Recommendations Related to Delays and Inconsistencies on Environmental Permitting

Appendix A1: List of Abbreviations

ALR – Aggregate Land Review (640 ac)

SME – Surface Material Exploration Program (320ac. 180 day approval)

SMC – Surface Material Licence (Maximum 5 ac, 2 ha. 1-year approval)

SML – Surface Material Lease (Up to 80 ac, 32.29 ha. 10-year approval)

LAT – Landscape Analysis Tool

LSAS – Land Standing Automated

GoA – Government of Alberta

AEP – Alberta Environment & Parks

AER – Alberta Energy Regulator

CORP – Conservation Operation Reclamation Plan (previously CRBP)

CNT – Consultative Notation

PNT – Protective Notation

EPEA – Environmental Protection and Enhancement Act

UAP – Updated Activities Plan

COP – Code of Practice for Pits

RAC – Regulatory Approval Center

GZL – Grazing Lease

DFO – Department of Fisheries and Oceans

NEB – National Energy Board

AUC – Alberta Utilities Commission

PLAR – Public Lands Administration Regulation

SIR – Supplemental information Request

WA -Water Act

TFA - Temporary Field Authorization

FMA – Forest Management Agreements

Appendix A2 - Diagram Legend



Start of process



End of process (positive outcome)



End of process (negative outcome)



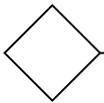
Separate process is initiated (described)



Separate process may be initiated (not described)



Step in process is time sensitive (can only be completed at certain times of the year)



Typical process (limited issues/concerns)



Section of concern in the process (inconsistencies and major time delays)

Pink background shows that proponent is responsible for task.



Additional notes and comments