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The December 2021 Mine Financial Security Program Standard

By: Drew Yewchuk

Regulatory Document Commented On: [The December 23, 2021 Mine Financial Security Program Standard](#)

In [a post back in May 2021](#), I mentioned a quietly made change to Alberta's Mine Financial Security Program (MFSP), which sets out the security requirements for coal and oil sands mines in Alberta:

One other change was made to the Mine Financial Security Program Standard: the reporting requirements under schedule 2, the "Mine Financial Security Program Annual Report" were decreased, so that approval holders no longer need to provide detailed financial security deposit information, detailed "Outstanding Reclamation Deposit Information" calculations, or "MFSP Asset Information". The press releases and explanations from the AER give no hint at why this information has been removed from Schedule 2 (see the old Schedule 2 [here](#))... Although I would like to provide an explanation for this change, none of the press releases even mention the change, much less provide any justification for it.

A new version of the [MFSP Program Standard was released on December 23, 2021](#). The new version reverses that change, restoring the reporting information requirements as they were before May 6, 2021. Since the MFSP Annual Reports are submitted by June 30 of each submission year, this means one year (2020) of the MFSP annual reports is missing the information, but that it will be collected again in the future.

Unfortunately, no other changes, or reversals of changes, appear to have been made to the Program Standard and the terrible decision to collect less security for the oilsands remains. In order to see the changes, compare Schedule 2 of the [December 2021 and May 6, 2021 versions](#).

Whether the omissions in Schedule 2 were an error by someone preparing the form or a policy decision that was made and then reversed is unclear. No government representative appears to have made any statement about the change.

Alberta Environment and Parks is [conducting engagement about the future of the MFSP](#) in the first half of 2022. The engagement sessions seem to be limited to mine operators and Indigenous communities, but the public can submit comments.

Happy new year.

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