What Are You Hearing? Three Environmental Trends to Watch in Alberta in 2026

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As consultants, we have the privilege of working with a wide range of clients, giving us a unique perspective on the trends and forces shaping environmental projects across industries. One question I am asked time and again is, "*What are you hearing?*" While some project drivers never seem to fade, like unexpected contaminant discoveries, spills, and asset retirement obligations, several emerging trends and project drivers have become noticeably more common in 2026.

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One trend that we see time and again again at Trace Associates Inc. (Trace) is with respect to how industry responds to new regulations, directives, or oversight requirements. First, the guidance is released. Then comes a period of uncertainty as organizations try to understand what it means and how it applies to them. There is commonly a group of early adopters that moves quickly to interpret and comply, while others take a wait-and-see approach. Eventually, once compliance requests start circulating and the interpretation of the new requirements is clearer, a much larger wave of organizations surges into action.

That same cycle is playing out in 2026. The observations below are largely focused on Alberta's oil and gas sector, where I spend most of my time and have my ear closest to the ground.

Remedial Action Plan (RAP) Trend

RAPs may not be new, but they are top of mind in Alberta right now. Much of that activity is being driven by the Alberta Energy Regulator (AER), which has been proactively requesting new RAPs to be developed, updates to existing plans, and additional supporting information. One of the key requirements for RAPs is a realistic timeline to closure. While timelines can sometimes be challenging to predict, especially when multiple rounds of investigation are needed to fully understand site conditions, this increased focus is driving the

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industry to implement remediation strategies and reconsider what is reasonable and achievable when it comes to timelines. The latest trend we are seeing with respect to RAPs is the additional oversight that the AER has begun implementing on abandoned sites located near municipalities, including encouragement for faster remediation and more frequent status updates.

Site-specific Liability Trend

Following the 2025 updates to the AER's Directive 011 (Estimated Liability), we are also seeing a significant increase in demand for site-specific liability assessments (SSLAs), with specific interest in wellsites and pipeline releases. Historically, we conducted SSLAs most commonly for gas plants or sites that had received the AER's "problem site" designation. Today, however, they are becoming a much more common consideration across a wider range of contaminated oil and gas assets.

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If you are preparing a RAP, it's worth taking a closer look at Directive 011. There is a good chance your environmental liability exceeds the regional liability estimate, which may trigger the need for an SSLA. At that point, it is natural to start asking questions such as, "*What does significantly higher than regional liability actually mean?*" or "*Does my site meet the criteria for a mandatory SSLA?*" These are questions we are helping clients navigate every day, as our team has been deeply involved in the evolving SSLA landscape since the Directive 011 updates were introduced. Trace has been conducting SSLAs since our inception.

For those taking a wait-and-see approach, one trend is becoming increasingly clear: the AER teams reviewing Records of Site Condition submissions and RAPs are actively identifying sites for SSLA review and referring them internally. As a result, compliance letters are becoming more common. The advantage of getting ahead of the process is that it provides greater flexibility to assess requirements, develop a strategy, and establish timelines proactively rather than working within a regulator-imposed schedule.

Also, on the radar in 2026 related to liability assessment, if your project requires power generation applications to the Alberta Utilities Commission, you will want to consider if you need liability estimates related to reclamation security.

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The Per- and Polyfluoroalkyl Substances (PFAS) Trend

While there are plenty of other emerging trends worth discussing, I'll finish with one that probably comes as no surprise: **PFAS**.

I know, I know. Many of us are experiencing a bit of PFAS fatigue. Too often, the conversation focuses on worst-case scenarios and alarming headlines that can make the issue feel overwhelming. But if we are being honest, many contaminants have seemed intimidating when they first entered the spotlight before the industry developed practical approaches to managing them.

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My view on PFAS is simple: stick to the fundamentals. Know the potential sources, collect the right samples, make decisions based on quality data, and validate results in the context of site conditions. It does not need to be a science experiment, and despite some of the narratives out there, not every site is a PFAS site.

That said, PFAS is a topic worth paying attention to. The science, guidance, and regulatory expectations are evolving quickly, and staying informed will be important over the next few years. Whether you are a PFAS expert or simply keep a trusted PFAS advisor on the 2026 version of speed dial, this is an area where keeping up with developments is recommended. For example, did you know Health Canada released a June 2026 memorandum regarding PFAS soil-screening values? The writing is on the wall that further evolution in guidance is on the horizon, and I would bet PFAS waste management direction is on the horizon as well. While we do not yet have all the answers, I expect we will continue to see new direction, new tools, and greater clarity emerge in the coming months and years.

The common thread across all three trends is that organizations that are informed and well prepared are less likely to be caughtoff guard and are better able to avoid non-compliance pitfalls. Whether you are evaluating RAP requirements, assessing potential SSLA triggers, responding to a non-compliance letter, or wondering if your supply chain or operations present a PFAS risk, now is a good time to understand how these emerging trends may affect your portfolio.

If you would like to discuss what we are seeing and what it could mean for your business (or if you just want to know more about those elusive PFAS soil-screening values), we would be happy to continue the conversation.

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