

**ANNEX 1: Advice to the Agency**

Comments provided by Indigenous Services Canada.

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**Table 1: Please use the table below to provide advice for the Agency’s consideration in its recommendation to the Minister of Environment and Climate Change and preparation of draft conditions**

Questions	Responses/Comments
<ul style="list-style-type: none"> <li>Has the proponent described all project components and activities in sufficient detail to understand all relevant project-environment interactions? If not, identify what additional information is needed.</li> </ul>	
<ul style="list-style-type: none"> <li>Were the study areas sufficient to predict potential effects from all relevant project-environment interactions, and to consider the effects within a local and regional context?</li> <li>Is the baseline information sufficient to characterize the existing environment, predict potential effects and obtain monitoring objectives? If not, identify what additional information is needed.</li> </ul>	
<b>Alternatives Assessment</b>	
<ul style="list-style-type: none"> <li>Has the proponent adequately described the criteria it used to determine the technically and economically feasible alternative means?</li> <li>Has the proponent listed the potential effects to valued components (VCs) within your mandate that could be affected by the technically and economically feasible alternative means?</li> <li>Has the proponent adequately described why it chose each preferred alternative means?</li> <li>Are there other alternative means that could have been presented? If so, please describe.</li> </ul>	
<b>Environmental Effects Assessment</b>	
<ul style="list-style-type: none"> <li>Has the proponent clearly described all relevant pathways of effects to be taken into account under section 5 of CEAA 2012?</li> <li>Has the proponent identified all potential effects to VCs, including species at risk, within your mandate?</li> <li>Were all potential receptors considered?</li> </ul>	
<ul style="list-style-type: none"> <li>Were the methodologies used by the proponent appropriate to collect baseline data and predict effects, why or why not?</li> </ul>	

Questions	Responses/Comments
<ul style="list-style-type: none"> <li>Has the proponent explicitly addressed the degree of scientific uncertainty related to the data and methods used within the assessment? If there are unaccounted for scientific uncertainties, describe them and indicate the options for increasing certainty in the predictions?</li> </ul>	
<ul style="list-style-type: none"> <li>Are the predicted effects described in objective and reasonable terms (e.g. beneficial or adverse, temporary or permanent, reversible or irreversible)?</li> </ul>	
<ul style="list-style-type: none"> <li>Has the proponent adequately assessed the potential cumulative environmental effects, including using appropriate temporal and spatial boundaries, examining physical activities that have been and will be carried out, and proposing mitigation and follow-up program requirements? Provide rationale.</li> </ul>	
<ul style="list-style-type: none"> <li>Has the proponent adequately described the potential for environmental effects caused by accidents and malfunctions, including the types of accidents and malfunctions, their likelihood and severity and the associated potential environmental effects? If not, identify what additional information is needed.</li> </ul>	
<ul style="list-style-type: none"> <li>Are you satisfied with the proponent's assessment of effects of the environment on the Project?</li> <li>Has the proponent characterized the likelihood and severity appropriately? Provide rationale.</li> </ul>	
<ul style="list-style-type: none"> <li>Has the proponent sufficiently described and characterized the project activities and components as they relate to federal decisions within your mandate? If not, identify what additional information is needed.</li> <li>Are changes to the environment, as they relate to federal decisions within your mandate, sufficiently described? If not, identify what additional information is needed.</li> </ul>	
<b>Mitigation</b>	
<ul style="list-style-type: none"> <li>Has the degree of uncertainty regarding the effectiveness of the proposed mitigation measures been described? If not, identify what information is needed.</li> <li>Is it clear how each proposed mitigation measure links to each potential pathway of effect?</li> </ul>	
<ul style="list-style-type: none"> <li>Would you propose different or additional mitigation measures? If so, provide a description of the mitigation measure(s), with rationale.</li> </ul>	

Questions	Responses/Comments
<ul style="list-style-type: none"> <li>Which of the proposed mitigation measures and/or project design elements do you consider to be necessary to reduce the likelihood of significant adverse environmental effects? Provide rationale.</li> </ul>	
<b>Residual Adverse Environmental Effects</b>	
<ul style="list-style-type: none"> <li>Are the identification and documentation of residual environmental effects described by the proponent adequate? If not, what are the aspects for which there is uncertainty and, where possible, indicate how these residual effects can be best described. If there is uncertainty, what are the options for increasing certainty?</li> </ul>	
<ul style="list-style-type: none"> <li>Did the proponent provide a sufficiently precise, ideally quantitative, description of the residual environmental effects related to your mandate? Identify any areas that are insufficient.</li> </ul>	
<b>Determination of Significance</b>	
<ul style="list-style-type: none"> <li>Are the conclusions on significance in the EIS supported by the analysis that is provided?</li> <li>Are the proponent's proposed criteria for assessing significance appropriate? This includes how the criteria were characterized, ranked, and weighted. Provide rationale. Where the proponent has <b>not</b> used one of the Agency's recommended key criteria (magnitude, geographic extent, duration, frequency, reversibility, and social/ecological context), has a rationale been provided?</li> </ul>	
<ul style="list-style-type: none"> <li>Were appropriate methodologies used in developing the conclusions on significance?</li> </ul>	
<ul style="list-style-type: none"> <li>Do you agree with the proponent's analysis and conclusions on significance? Provide rationale.</li> </ul>	
<b>Monitoring and Follow-up</b>	
<ul style="list-style-type: none"> <li>Does the proposed monitoring and follow-up program verify the predictions of the environmental assessment as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the effects assessment.</li> </ul>	
<ul style="list-style-type: none"> <li>Does the proposed monitoring and follow-up program verify the effectiveness of proposed mitigations as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the proposed mitigation.</li> </ul>	
<ul style="list-style-type: none"> <li>Is the objective of the follow-up program clear and measurable?</li> <li>Does the follow-up program include sufficient detail, and technical merit, for the Agency to achieve the stated objective through a condition (e.g. sufficient baseline dataset, monitoring plans, acceptable thresholds of change, contingency procedures)?</li> </ul>	

Questions	Responses/Comments
<ul style="list-style-type: none"> <li>Are you aware of any federal or provincial authorizations or regulations that will achieve the same follow-up program objective(s)? If so, how do these achieve the objective(s)?</li> </ul>	
<b>Additional comments, views, advice</b>	
<ul style="list-style-type: none"> <li>Provide any other comments.</li> </ul>	<p>Suncor's response to Indigenous concerns states their intentions to share results of a potential follow-up program.</p> <p>ISC strongly recommends Indigenous involvement at <u>all</u> stages of environmental monitoring and follow-up, including in the pre-drilling survey, and subsequent design and implementation of any follow-up program that may be required.</p> <p>Thresholds defined by Western science can differ from Indigenous perceptions of what are considered 'sensitive environmental features' .</p> <p>Meaningful Indigenous involvement in environmental monitoring and follow-up, including identification of indicators and thresholds, contributes to important relationship-building, trust and transparency, and opportunities for more robust incorporation of Indigenous knowledge.</p> <p>This should be considered in all instances of environmental and socio-economic monitoring and follow-up related to project activities, including cumulative effects.</p>

**ANNEX 2: Information requirements directed to the proponent**

**Table 2: Please use the table below to provide your department’s comments and suggestions for information that should be required from the proponent to ensure the information in the EIS is scientifically and technically accurate and is sufficient to make a determination of significance on environmental effects.**

ID	Project Effects Link to CEAA 2012	Reference to EIS guidelines	Reference to EIS	Context and Rationale	Specific Question/ Request for Information
<p>Create an ID # for each item e.g. CEAA-1, DFO-1</p>	<p>Select the section 5 effect to which your comment applies:                      5(1)(a)(i) Fish and Fish Habitat                      5(1)(a)(ii) Aquatic Species                      5(1)(a)(iii) Migratory Birds                      5(1)(b) Federal Lands /Transboundary                      5(1)(c)(i) Aboriginal Peoples Health/ socio-economic conditions                      5(1)(c)(ii) Aboriginal Physical and Cultural Heritage                      5(1)(c)(iii) Current Use of Lands and Resources for traditional purposes                      5(1)(c)(iv) any Structure, Site or Thing of Historical, Archaeological, Paleontological or Architectural Significance</p> <p>5(2) Linked to Regulatory Permits/Authorizations (specify which legislation)</p> <p>If the interaction between the issue of concern and a section 5 effect is unclear, indicate the interaction pathway in the Rationale column.</p>	<p>Identify which section(s) of the EIS Guidelines are related to the comment.</p> <p>e.g. Part 2, section 6.6.1 Effects of potential accidents or malfunctions</p>	<p>Identify which section(s) of the EIS and appendices are related to the comment (Volume, section, page number).</p> <p>e.g. page 78, section 6.6.1 Accidents and malfunctions</p>	<p>Provide applicable background or rationale for requesting the information and why it is important for understanding the effects of the Project or for developing a follow-up program to verify the accuracy of EA predictions or the effectiveness of mitigation measures.</p> <p>e.g. The EIS notes that the modelled flow rate of oil released to the marine environment during the blowout scenarios would decline over the duration of the 30-day release. There was no rationale provided for the declining flow rate in either the main EIS document or the corresponding technical report.</p>	<p>Ask a specific question, or request specific additional information or clarification.</p> <p>e.g. Accidents and malfunctions – Provide rationale for using a declining flow rate in the modelling of the blowout scenarios, or update the analysis to reflect how using a constant flow rate would alter spill modelling results.</p>

**ANNEX 3: Advice to the proponent**

**Table 3: Additional advice to the proponent, such as guidance or standard advice related to your departmental mandate**

ID	Reference to EIS	Context and Rationale	Advice to the Proponent
<p>Create an ID # for each item</p> <p>e.g. CEAA-1, DFO-1</p>	<p>Identify which section(s) of the EIS report and appendices are related to the comment (Volume, section, page number).</p> <p>e.g. Part 2, section 6.4.1 Fish and fish habitat</p>	<p>Provide the context of why you are providing the advice to the proponent.</p> <p>e.g. This is standard advice provided to proponents regarding applications for Disposal at Sea permits.</p>	<p>Provide specific advice to the Proponent that would not be considered an information requirement (Annex 2) to help determine the sufficiency of the EIS. This may include the guidance or standard advice related to your departmental mandate. Make clear whether this information pertains to the environmental assessment or the regulatory phase.</p> <p>e.g. Please refer to document XXX on website ZZZ that describes the permitting process required for any Disposal at Sea permit under CEPA 1999.</p>