

Athabasca Landing Métis Community Association  
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**RE: Athabasca Landing Métis Community Association (Athabasca Landing Métis Local 2010) Public Comments on the Suncor Base Mine Extension Project**

**Suncor Base Mine Extension Project**

Canadian Impact Assessment Registry File No.: 80521

*The Agency encourages you to use the "Submit a Comment" feature on the Agency's Registry website using reference number: 80521*

**Potential Effects and Impacts**

1. Please identify any effects of the Project that are of concern to your community. Also please identify any effects that you are aware of that are not listed in the initial project description.

*Note: Information on effects and direct and incidental effects as well as effects within federal jurisdiction are defined in section 2 of IAA<sup>1</sup>.*

The Suncor Base Mine Extension Project (the Project), if it were approved, would consist of 20,000 ha of oil sands mine. Athabasca Landing Métis Community members have Constitutional rights to hunt, trap and fish for food on crownlands. Our members exercise these rights along the Athabasca River basin and associated watersheds, including in the area immediately north of Fort McMurray where the Project is proposed. Athabasca Landing Métis is concerned about the Project's direct and adverse impacts on our rights to hunt, fish and trap. We are also concerned about the Project's potential adverse impacts on our community's traditional land use such as picking medicinal plants and berries, camping and sharing knowledge with our youth.

Athabasca Landing Métis Community Association was not included in the Proponent's list of Indigenous groups in the Project Description. This is because Suncor has yet to engage with your community to identify the Projects' potential impacts. As such, the Project Description does not contain any information about the potential impacts of the Project on our community's traditional land use, culture, rights or socioeconomic status. This is a key gap since we have previously submitted statements of concern to Suncor about other Projects and we have a record of engagement with Proponents in the Oil Sands area due to ongoing impacts to our community, land and culture.

As a community that is engaged in Environment and Climate Change Canada's Indigenous Community Based Monitoring Program, we are concerned about the Project's contribution to

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<sup>1</sup> A link to IAA text can be found here: <https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/legislation-regulations.html>

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climate change and environmental degradation in the Athabasca River basin including impacts to migratory birds, species at risk, and fish stocks in the Athabasca watershed.

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2. Please describe how the potential effects of the Project could result in changes to your community's:

(a) physical and cultural heritage (e.g. ceremonial sites, burial sites, cultural landscapes)

Our community is based in Athabasca Landing. This was a key hub in the historic transportation network of the fur trade that included Athabasca, Fort McMurray and Fort Chipewyan. The Athabasca River is the lifeblood of the regional cultural landscape and supports traditional river transportation that is part of traditional uses and cultural expressions such as hunting, fishing and gathering. Extensive oil sands mining along the Athabasca River north of Fort McMurray has already dramatically and permanently altered our traditional cultural landscape. This has had psychological and cultural effects that have made our Elders suffer and denied our youth the pleasure of enjoying their natural and cultural heritage. This Project will deepen those effects and expand the cumulative footprint of industrial activity in the Athabasca basin.

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(b) current use of lands and resources for traditional purposes (e.g. hunting, fishing, trapping)

Athabasca Landing Métis Community members travel regularly to Fort McMurray to work, meet with other Métis friends and family, or to practice harvesting rights such as hunting and fishing. The right to hunt, fish, trap and gather on crownlands north of Fort McMurray is valued by our community members. Disruptions to an additional 20,000 ha of viable crownland north of Fort McMurray will have a direct and negative effect on our community's current use of those lands for traditional hunting, fishing, camping and plant use. Of particular concern is the potential disruption of creeks that drain the Project area into the Athabasca River, water draws from the river for industrial use, and the additional extent of deforestation and the use of tailings pond which interfere with the natural movement of big game, migratory birds and fish that our community relies upon for traditional subsistence hunting and fishing.

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3. Please describe how the Project may result in changes (both positive and negative) to your community's :

(a) health, social or economic conditions (e.g. employment opportunities, easier access to goods and services, economic development, accessibility to health-care services);

If the Proponent were to engage with our community to identify the potential positive and negative socioeconomic and health effects, then it would be possible to develop mitigation plans or measures to maximize potential Project-related benefits such as employment, contracting, training or cultural effects mitigation and monitoring and work on measures to minimize negative effects. However, without this engagement to date, our community has not been offered these opportunities by the Proponent. Without engagement, consultation, impact

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identification and mitigation planning, our community will be left to deal with the socioeconomic and health effects of the Project on our own.

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(b) Indigenous knowledge, indigenous language or indigenous culture.

The sustainability of Indigenous knowledge in the oil sands area depends on the availability of large tracts of crown land that can support wildlife, biodiversity and traditional use including traditional conservation of game stocks through rotation of hunting areas. Without large tracts of available crown land such as those within the proposed Project area, the sustainability of Indigenous knowledge, culture and even language is at risk since Elders will have fewer opportunities to teach youth. As teaching and learning about Indigenous knowledge best takes place on the land, destruction of the land puts knowledge, language and culture at risk.

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4. Please describe how the Project may result in any change (positive or negative) to :

- (a) the intersection of sex and gender with other identity factors (would there be effects to different sub-groups within your community, identified based on factors such as gender, age, race, religion etc.. For example, to women, youth, elders);

The benefits of this Project include employment and contract opportunities that will benefit some members of our community who have experience working in oil sands mining. However, these same members will also have to compete for contracts and jobs with other community members and outside workers and contractors. Without engagement with the Proponent to extend favourable contracting and employment opportunities to our members, including women and youth, our community will not be able to compete.

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- (b) sustainability, considering, for example, the interconnectedness and interdependence of human-ecological systems and the well-being of present and future generations.

This Project threatens the sustainability of the remaining bond that people in the Athabasca Basin have with the local eco-system which has already been disrupted on a massive scale by Suncor's previous operations. Since this Project would expand the existing footprint therefore it would compound and intensify the existing effects of Suncor's oil sands operations. These effects include the loss of land, changes to places where our people hunt, the devastation of waterways and traditional fishing activities, and the ever-present cloud of emissions hanging over our lands. Métis people are seeking the opportunity to reclaim our lands, livelihoods, cultural traditions and ecosystem from the negative effects of environmentally destructive oil sands mining. However, by excluding our community from the opportunity to participate in impact identification, mitigation and monitoring, the Proponent is signaling that it is business as usual in the oilsands, despite recent attempts by the federal government to overhaul environmental impact assessment to be more comprehensive and inclusive.

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5. If you expect the Project may impact your community's rights as protected under section 35 of the *Constitution Act, 1982*, please describe how.

Athabasca Landing Métis Community members exercise Section 35 Constitutionally-protected rights to hunt, trap and fish for food on crownlands including in the proposed Project area north of Fort McMurray. We are concerned that the Project would directly infringe upon these rights due to potentially adverse impacts to wildlife, fish, water, land, forests, air and human health.

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### **Approach to Consultation and Engagement**

6. If a federal impact assessment is required for the Project, the Agency will be developing a draft Indigenous Engagement and Partnership Plan and, if applicable, will contact you to seek your comments. Please provide information on how you would like to be consulted by the Agency (for example, does your community have specific cultural practices, traditions or protocols, etc.).

Any notification or request for information from our community requires sufficient time to respond. For public comments, this period should be at least one month.

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7. Please also provide your views on how you would like the proponent to engage your community during all phases of the Project.

For this Project, our community requests funds from the Proponent to conduct a community-specific and Project-specific cultural impact assessment that includes impacts to socioeconomic well-being, rights and traditional use. We request a period of time of approximately 4 months to conduct this study. Following that, we will develop an impact mitigation and monitoring plan in collaboration with the Proponent and under the condition that the Proponent provide adequate funds for this Project and all aspects of engagement and consultation.

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8. If a federal impact assessment is required for the Project, the Agency will act as the Crown Consultation Coordinator and will be responsible for implementing the Duty to Consult. Do you have any views on how the Agency should work with your community in relation to the assessment of impacts on the rights of your community, as protected under section 35 of the *Constitution Act, 1982*?

The Crown must provide our community with sufficient time to respond to requests for information. In the case that the information is complex and requires us to consult with our Elders and community harvesters, the Crown must be willing to provide additional time and funds.

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