



## **Metis Nation of Alberta- Region 1**

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Suncor Base Mine Extension Project

Impact Assessment Agency of Canada

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### **RE: Suncor Base Mine Extension Project**

Canadian Impact Assessment Registry File No.: 80521

The Métis Nation of Alberta Region 1 (Region 1, the Region) submits the following comments following the guiding questions provided by the Impact Assessment Agency (the Agency) in response to the notice for the proposed Suncor Base Mine Extension.

### **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.

Project effects that are of concern to the community fall within environmental, cultural and socio-economical principals. However, to fully realize what the potential impacts are of this project to the community further assessment is required.

Reviewing at the project from a regional and sub-regional perspective, there are concerns on how the project will overall impact the cumulative environmental effects of existing and future projects within the oil sands region, and climate change. Concerns of hydrological impacts to waterbodies and watercourses within the project boundaries and surrounding area are anticipated. The Métis have a long history of utilizing the watercourses as a means to navigate the landscapes and have a cultural connection to water. The construction and operation of the site will require water intake and discharge, that can potentially affect water quality and quantity, access, ecological health and biodiversity. One example is decreased fish habitat and quality which will have impacts on the community's sustenance harvesting and cultural sharing.

The project itself will result in direct long-term (generational) changes to the natural landscapes, there are concerns of impacts on wildlife and wildlife habitat. Traditional harvesting may be impacted through the loss of and/or access to traditional plants, and wildlife in harvesting areas. There are also concerns that traditional land users will have to travel further away to practice traditional harvesting. Atmospheric

concerns include impacts to air quality, foul odors, light and noise. Further understanding of how this project will impact the overall airshed in the region is essential. Noise and light pollution from the operations is concerning for its potential to impact wildlife activity and patterns.

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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)

There are potential impacts to culture and heritage, including the inability to practice and pass on culture, knowledge, customs, and laws. With the development of the project the community will have to adapt to the changing landscape. Potential changes may involve community members geographically having to adjust where practice cultural activities and exercise rights to further away places that are less impacted by development. In some cases, the physical places themselves hold significant importance and the ability to adapt is not possible; this may result in the inability to maintain cultural practice.

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

Community members use the land to exercise rights, such as hunting, fishing, trapping and/or gathering. Restoration concerns after project completion include the proponent's inability to truly restore the landscape back to a pre-development state. There are concerns of contamination to the land and traditionally gathered food sources. This may impact how the community interacts with the surrounding land and consumes traditional foods.

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(c) structures, sites or things of historical, archaeological, paleontological or architectural significance (e.g. artifacts, important historic buildings or symbols)

There are concerns that structures, sites or things that are of historical, archaeological, paleontological or architectural significance within the Project area may be impacted or destroyed permanently by development of the Project. Further investigation and assessment with the community is required to further understand the depth of this impact. One opportunity is to have community monitors participate in archaeological, and/or historical reviews.

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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);

With the proposed project the Region foresees this as an opportunity to establish a positive relationship with the proponent to work towards mutually agreeable provisions. The project can lead to further economic development within the community; some examples include creation of training programs, procurement and employment opportunities.

Overall health status and community well-being may be impacted negatively due to increased development activity and changes to the natural landscape where cultural practice often takes place. There can be a loss to sense of connection to the land, privacy and safety, as well as mental well-being. Recognizing this risk there must be adequate planning for culturally appropriate social support programs available to the community that will result in a positive impact health-care services within the region.

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

Métis knowledge, culture, and language are deeply rooted within interactions with the surrounding environment. This project will reshape the natural landscape and will have alter how the community interacts with the land and their ability to exercise Aboriginal Rights.

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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).

People within the community hold their own personal interactions with the land and practices; therefore, they will experience different effects from the project. As a result, individual community members will respond differently to potential impacts from the project. To further identify factors associated with particular sub-groups such as elders, youth, and women further engagement with the community is necessary.

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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.

How traditional knowledge is utilized and applied by future generations within the project and surrounding area will potentially be affected. The potential loss of land space to practice culture, and other traditional activities may result in cultural generational gaps.

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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.

Anticipated project impacts to Aboriginal Rights include rights and access to land, medicine and sustenance resources, restrictions to harvesting activities, practicing cultural and customs including language and ceremony. For the Region to determine project specific impacts a Traditional Land-Use Study and community interviews would need be conducted. If a federal impact assessment is required, the Region would work collaboratively and in partnership with the Agency during the integrated impact assessments for Crown Consultation purposes.

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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.).

The Métis Nation of Alberta Region 1 has a Consultation Protocol Agreement that sets out the process for collaborative and cooperative participation of the Métis community's governing structures that is inclusive of the Region, Locals within the Region and the Métis Nation of Alberta (MNA) itself. To ensure engagement with potentially affected Métis is meaningful and respectful the Region asks that the Agency work with the Region 1 Consultation Office to develop the Engagement and Partnership Plan for the Métis. Region 1's preference to engagement is that the Métis Government itself engages its own community

members to inform comments, arguments, concerns, or acceptance of effects and impacts from the project.

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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.

Proponent engagement should align with the recommendations to the Agency for Consultation purposes which is to work through the Region 1 Consultation Office. It is necessary for engagement to be on-going during all phases of the Impact Assessment Process and the projects lifecycle. For the Métis, Crown Consultation does not just end once a decision has been as there is on-going monitoring and compliance involved through to decommissioning and reclamation of the project which could have impacts on rights protected under section 35 of the Constitution Act. By working through the Region 1 Consultation Office the proponent can work with the Coordinator to collaborate on ways to engage that may include scheduling technical and community meetings, land-based workshops, and open houses.

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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*?

Crown Consultation activities should align with aforementioned recommendations for Agency and Proponent engagement preferences. Self-government decisions in relation to impacts to the community and rights will be directed through the Regional Consultation Committee that is established under the Regional Consultation Protocol. The committee itself is made up of members appointed by the Regional Council that is comprised of Local Community Presidents, the elected President and Vice-President of Region 1 that form part of the MNA Provincial Council. The Consultation Office has a delegated coordinator who is responsible for ensuring all project information and supporting documentation is supplied to the Regional Consultation Committee to determine further actions to be taken in response to the proposed project.

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For questions of information please contact the Region 1 Office

Sincerely,

<Original signed by>

James Cardinal

President of the Métis Nation of Alberta - Region 1