

April 30, 2020

Suncor Base Mine Extension Project
Impact Assessment Agency of Canada
1145-9700 Jasper Avenue, Edmonton, Alberta T5J 4C3
Email: IAAC.BaseMine-MineBase.AEIC@canada.ca

RE: Suncor Base Mine Extension Project
Canadian Impact Assessment Registry File No.: 80521

Métis Nation of Alberta Association Local Council 1954 Touchwood Lake / Big Bay Area (Local 1954, the Local) submits comments to the Impact Assessment Agency (the Agency) as an initial response 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.*

Concerns from Local 1954 are impacts to the community's ability to exercise their rights under section 35 of the Constitution Act, 1982. Construction of the project will have substantial direct and indirect impacts to the community that include a decline in the quantity and quality of traditional foods harvested within the project area. Since the production of bitumen in the region in 1967 there have been several major mining projects operating that contribute to the cumulative environmental effects of the region, and global climate change; there are concerns on how this project will influence these factors. The project will cause changes to the landscape and natural environment that the community is currently utilizing for cultural purposes. This has raised concerns on how the community will continue to practice these traditions as they may have to travel further to access land, and or adapt in different ways if this project were to be approved.

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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)*

The community has cultural and ancestral ties to the project area, changes to the landscape could affect the community heritage held within the land itself. Concerned with the potential loss of physical or cultural heritage Local 1954 would have to conduct further assessments of the site.

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

The project will affect Local 1954's ability to access traditional resources that the community utilizes for food sources. Current traditional land uses by the community include fishing, hunting, and gathering other plants and animals. There are also community concerns with the safety of consuming traditional foods as a result of contamination to the environment from the project.

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

Any structures, sites or things that are of historical, archaeological, paleontological or architectural significance within the area may be destroyed permanently; Local 1954 would have to conduct further investigation to access these concerns.

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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);*

There are well documented arguments that Indigenous communities are at risk to increased racism, violence, addictions, and other influences from resource development such as mining which will negatively

impact the overall well being of the community. Access to food and medicine is a concern for Local 1954, the community utilizes traditional harvesting to survive and maintain their way of life. With any major development like the proposed project there are economic development, employment and training opportunities. Local 1954 recognizes these potential benefits for the community to pursue as part of the project planning process.

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

For Local 1954, it is integral that the community's way of life is preserved for future generations. Community knowledge, language and culture will be impacted through the ability to exercise rights. There are concerns that with the inability to exercise their rights that there will be a loss or gap to these considerations if the project were to be approved.

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);*

Community members such as the youth, women, and elders have not been engaged on this project at this stage to identify specific sub-group community concerns due to the Covid-19 health restrictions in place. More community discussion is required to identify specific outlooks from the women, youth, and elders of the community.

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

Local 1954 community is comprised of traditional land users and has practiced sustainability with the land for generations. The community is not distinct from, but part of what makes up the diverse human-ecological system within the region. By altering the natural environment, the effects will cascade onto the community and impact their way of life.

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.

Local 1954 is concerned with impacts the project will have on their ability to exercise Aboriginal rights that are protected under section 35 of the Constitution Act, 1982. The project area is within harvesting zone B of the 2018 Métis Harvesting in Alberta Policy that the community utilizes for fishing, hunting, trapping, and gathering. With the loss of this area there is concerns that the community will have to go farther away to exercise these rights, and will lose the ability to provide sustenance for their families.

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 Agency can contact Local 1954 President Ernest Deschambeau at <email address removed> for guidance on how to consult that is respectful of community protocols, cultural practices and traditions.

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

Local 1954 requests that the proponent contact President Ernest Deschambeau at <email address removed> to engage with the community. It is noted that Local 1954 was not identified in the initial projected description as having a

possible interest in the proposed project. However, Local 1954 does in fact have an interest and should be engaged and consulted with on the matter as they will be impacted.

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?*

Local 1954 requests that the Agency contact President Ernest Deschambeau at <email address removed> for Crown Consultation. The community must to be consulted during all phases of the project.

Sincerely,

<Original signed by>



Ernest Deschambeau

President of the Métis Nation of Alberta Association Local Council 1954 – Touchwood Lake / Big Bay Area