

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 2002 Buffalo Lake (Local 2002, the Local) has the following comments to the Impact Assessment Agency (the Agency) on 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.

Buffalo Lake Local 2002 is concerned that their community will be overlooked during the assessment process as being impacted. Historically the community has accessed and utilized the lands within the area for cultural purposes and will be impacted if this project were to be approved. Oil sand development has reshaped the landscape in the area causing wildlife diversity and patterns to change that are felt by the community when maintaining their way of life. There is concerns on how another project will contribute to these overall effects and climate change.

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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)

Buffalo Lake Local 2002 is located south of the project area, and has maintained both ancestral and cultural connections to the land within the project area. Further assessment is required to document physical and cultural areas within the project and surrounding area that may be affected if the project were to be approved.

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

Local 2002 would be impacted by loss of access and to land and quality of traditional resources within the area. The land is being accesses for hunting, fishing, and gathering purposes by the community. There are concerns that the wildlife and fish harvested would not be safe to consume by the community due volatile organic compounds, hydrocarbons, particulates, and other contaminants entering the ecosystem through deposition.

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

Local 2002 would require further assessment of the area to ensure cultural preservation of physical artifacts and cultural sites. There are concerns that structures, sites or things that are of historical, archaeological, paleontological or architectural significance within the area may be lost during construction and operations this project.

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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);

Local 2002 can find value in the project in regards to training and employment opportunities, as well as economic development. There are concerns however that the community will be overlooked when working with the proponent to establish a relationship to negotiate provisions for community accommodations as part of project planning process. Increases to violence against women, racism, addictions, and other dangerous behaviours that are linked to resource development are of concern to Local 2002. When there are influxes in mining workers that often are fly in and out there are concerns on access to general goods and services, as well as health-care by the permanent community members.

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

With continued loss of land access, and changing landscapes from resource development there are concerns that the environment will change so drastically that cultural practices and ceremony will be difficult to pass on to future generations. Community knowledge could be one way to reflect on the project when operations are concluded and whether or not restoration of the land truly repaired the ecosystem from the disturbances caused by the project.

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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);

Local 2002 youth, women, and elder community members will have unique perspectives that are negative and positive on the what impacts of this project will have. In light of the current Covid-19 outbreak, and distancing measures put in place; community members have not been thoroughly engaged enough to respond in-depth on this topic. However, there are anticipated impacts unique to the women, youth, and elders of the community.

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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.

If the project were to be approved the changes to the landscape would directly impact the community's interconnectedness with the ecosystem. Sustainable management and interactions with the land have been a way of life for Local 2002, and the community recognize that there will be long term effects on overall well-being and cultural expressions for future generations.

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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.

Local 2002 traditional harvesters exercise rights under section 35 of the Constitution Act, 1982 by accessing territorial lands classified as harvesting zone B under the Métis Harvesting in Alberta Policy (2018). Rights to hunting, gathering, fishing, trapping, and cultural practice will be impacted by the inability to access land, and changes made to it. There are concerns of increased recreational hunters from workers moving to the region for work that will take away from the available wildlife resources and the communities rights to harvest them.

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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.).

There are protocols and traditions that must be adhered to when engaging with the community. Agency engagement can be directed through President Brian Ladouceur at <personal information removed>

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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.

The proponent can contact President Brian Ladouceur of Local 2002 at <personal information> for further direction on how to engage with the community.

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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?

Local 2002 should be consulted with during all stages of the project, the Agency can contact President Brian Ladouceur at <personal information> for Crown Consultation purposes.

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Additional information can be requested from the Métis Nation of Alberta Association Local Council 2002 – Buffalo Lake by contacting President Brian Ladouceur at <personal information>

Sincerely,

Brian Ladouceur  
President of the Métis Nation of Alberta Association Local Council 2002 – Buffalo Lake