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April 29, 2020

Impact Assessment Agency Canada
Prairie and Northern Region
Place Canada Suite 1145, 9700 Jasper Avenue
Edmonton, Alberta T5J 4C3

Attention: Ms. Allison Lefebvre

Subject: Comment on the potential impact assessment of the proposed Suncor Base Mine Extension Project

In opening, the Willow Lake Metis (WLM) would like to acknowledge Suncor for identifying this process was taking place and was willing to make the initial contact with IAAC to allow for Willow Lake to participate. Additionally, we would like to acknowledge IAAC for their openness and clarity on the engagement process, as well as for the acknowledgment of the Willow Lake Metis Communities' Section 35 rights as Indigenous Peoples.

Suncor is already a valued partner with the WLM and as such the initial notification of the proposed project was direct from Suncor to WLM. Providing an open setting for review, comments and initial thoughts on the proposed has given us a good bases for our response herein.

Initial Project Description

In review of the initial project description it is evident that a project of this size carries with it high impact to Canadians on many levels. WLM will highlight areas in which we will continue to work with Suncor, through our existing agreement, to ensure appropriate attention is taken in our key areas of concern.

Environmental

A project of this nature requires a comprehensive review of the environmental implications of a project of this nature. WLM is in the heart of the Oil Sands and has vast experience in working with Oil Sands operators on both reviewing proposed projects as managing continuing operations and subsequent environmental risks. With our strong environmental values,

leveraging our relationship with Suncor, WLM will ensure an appropriate resolution of our concerns will be achieved.

That said, WLM has identified key areas of concern with respect to the proposed project from an environmental perspective and have already shared these with Suncor directly. The two main areas of concern are:

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- 1) **Mitigation of impacts to the water systems being disturbed** – Within the proposed mine location there are specifically three lakes and three rivers that will need to be re-routed or disturbed in some manner. It is crucial that this project includes a deep review of the environmental impacts, develop modern and efficient plans that use new technologies to minimize environmental impacts, while taking a risk adverse approach.
 - 2) **The proposed project has a very large footprint** – WLM believes that the project review and approval of the base mine expansion should include a requirement to review and revise the existing reclamation plan for the current base mine and ensure it is brought up to date with new strategies, technologies and timelines, as the initial project was approved years ago and should be made current prior to approving an extension of the mine.
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Economic Benefits

Locally this project will be well timed, as we all work our way through these unprecedented times and the significant impact the COVID-19 has had on the world but more specifically the oil and gas sector. We must consider what will be needed to continue to strengthen our economy and support the countless people this project would employ and support. WLM understands that a project should not be approved based on economic benefit alone; however, considering the local, provincial, national and international benefit from a project such as this should be reviewed.

Socio-benefit

As Suncor has outlined in their Initial Project Description we can see the Socio-benefits that our country has received from Suncor's operations and their continued vision to help grow communities and support our people and country through responsible operations and by giving back. WLM supports Suncor as their values around community investment and socio-benefits are strong and continue to be exercised.

The Socio benefits from this project would be such that would be sustained long after the project has been completed.

Cultural

WLM recognizes that the proposed mine will impact WLM traditional territory, and area still used today by our members for traditional land use. This is another reason WLM would like to ensure that the reclamation of the existing mine be reviewed and updated to be relevant for approval of the mine extension and that is a direct means to return already impacted lands to the rights bearing peoples as quickly and effectively as possible.

Closing

Willow Lake Metis is appreciative of the current impact assessment process. We believe that early engagement can lead proactive and supportive engagement in lieu of previous experiences where late engagement can lead to poor foundational relationships.

WLM supports RESPONSIBLE development of natural resources and sees it as a necessity for Canada's future. We will continue to work with Suncor on our concerns throughout this project development on a regular basis, as outlined in our current agreement.

Regards,

Justin Bourque
Vice President – GM Operations
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Anzac, Alberta