



Lakeland Métis Community Association  
P.O. Box 929  
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Ph: (780) 404-9291

May 1<sup>st</sup>, 2020

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Impact Assessment Agency of Canada/ Government of Canada  
<personal information removed>

**RE: Lakeland Métis Community Association (formerly Lakeland Métis Local Council 1909) 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>.*

Due to the geographic size and scope of the Suncor Base Mine Extension Project (the Project) which would consist of over 20,000 ha of open pit mine footprint; and considering that Lakeland Métis Community members practice constitutionally protected (Section 35) rights to hunt, trap and fish for food on crownlands along the Athabasca River basin and associated watersheds north of Fort McMurray: Lakeland Métis Community Association is concerned over the Project's direct and adverse impacts on our Métis community members' rights to hunt, fish and trap for food as well as the Project's direct and adverse impacts on traditional uses such as food and medicinal plant gathering, travel, camping and occupancy for traditional purposes.

Since the Proponent (Suncor) has excluded Lakeland Métis Community Association from previous Project engagement and impact identification activities, the Project Description does not contain any information from Lakeland Métis about the potential impacts of the Project on our community's rights, traditional use, socioeconomic interests, or cultural practices.

In addition to the Project's direct and adverse impacts to our members' rights and traditional land use practices, Lakeland Métis Community Association is concerned about the Project's contribution to cumulative environmental effects including

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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>



downstream impacts to the Athabasca River system, migratory birds, species at risk such as caribou and woodland bison and impacts on 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)

The Athabasca River basin is part of the regional cultural landscape that is essential for traditional transportation, camping, hunting, fishing and gathering. The Athabasca River was historically the Métis peoples' transportation route during the fur trade that took our people between the Lac La Biche area to Fort Chipewyan and Fort McMurray. Additional oil sands mining along the river in close proximity to Fort McMurray will create additional aesthetic disruptions to this cultural landscape from deforestation, changes to topography, noise, emissions and additional presence of humans, rendering the lands unrecognizable.

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

Many Lakeland Métis Community members live and work in Fort McMurray on a seasonal basis although our community is based in Lac La Biche. On these regular visits to Fort McMurray to work or visit friends and family, our members hunt, fish, trap and gather on crownlands immediately north of Fort McMurray. The Project will remove an additional 20,000 ha of viable crownland for hunting immediately north of Fort McMurray in a regional context that is already characterized by massive destruction of crownlands, forests and waterways due to oil sands mining. The Project will disrupt additional waterways and tributaries of the Athabasca River that support fishing, making it difficult to fish near Fort McMurray. The combined effects of this Project and surrounding, existing oil sands facilities will have a direct and negative impact on hunting, fishing, trapping and gathering food and medicinal plants in the Fort McMurray area, resulting in massive infringements on Indigenous rights.

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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);

The Project will contribute to opportunities for economic development and employment in Fort McMurray but without direct engagement between Lakeland and the Proponent, our community members will be excluded from preferential access to jobs, contracts and mitigation plans and as such, our members will have to compete

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with outside workers and contractors for jobs, access to local services and infrastructure.

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

The Project will further interfere with reclamation efforts underway to salvage traditional land use including hunting, fishing, trapping and gathering plants and related Indigenous knowledge of crownlands in the Fort McMurray area and our Métis community's opportunities to teach our youth about the traditional way of life and Indigenous knowledge and culture on crownlands surrounding Fort McMurray.

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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);

This Project will favour members of our community with experience working in oil sands mining but will create costs to our members who live traditionally by hunting and fishing on the River, many of whom are Elders. Further, oil sands employment in primary extraction is gender biased in favour of employment of men.

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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.

The expansion of the existing footprint of the Suncor Operations north of Fort McMurray into some of the few remaining tracts of available crownland will further interfere with Métis community's region-wide efforts to promote retention of Indigenous knowledge of crownlands in the Fort McMurray area since much of this knowledge is place-based and requires a pristine environment.

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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.

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well as the Project's direct and adverse impacts on traditional uses such as food and medicinal plant gathering, travel, camping and occupancy for traditional 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.).

Our community requires notification with at least 30 days time to respond to requests for information, statements of concern or public comments. Further, our community typically provides information of the type requested in this document through the production of traditional knowledge, traditional land use and occupancy studies and community-specific socio-economic and cultural impact assessments which require 4 months to complete and funding and support from the Proponent.

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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 should notify our community directly of the Project Description and timelines for submission of statements of concern. Then the Proponent should agree to fund a Project-specific and Lakeland Métis community-specific traditional land use study and socioeconomic impact assessment. Once we have identified the full extent and significance of the potential effects of the Project, Lakeland expects that the Proponent will work with our community to develop Project-specific impact mitigation, monitoring and compensation plans and agreements.

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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 level of detail and complexity of the information required by the Crown in implementing its Duty to Consult requires that it engage and consult early and often with our Community, leaving ample time to respond to requests for information and providing sufficient resources. To respond to this Project description and provide public comments, our community was given only 3 days notice.

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