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Comments Pertaining to the Base Mine Extension Project by Suncor Energy Inc

Our community organization is supportive of the Base Mine Extension Project, because of its positive impact on the economy of Alberta and Canada, but we are concerned about its impact on the natural environment. The project will have a footprint of over 20 thousand hectares, a significant area of land, in an area that is already carved up for industrial usage and has been under pressure due to industrial expansion for some time. Due to this very fact alone, it will cause the loss of land used by Indigenous peoples of north-eastern Alberta, ourselves included. The loss of traditional land to industrial activities in Fort McMurray is not a matter for an isolated project. It represents the ongoing and compounded loss of land by Indigenous people. This loss of land is directly linked to other negative effects industrialization in Fort McMurray and surrounding areas. Such effects include cultural, economic, social, and environmental.

Our initial concern with the Project is the loss of land and loss of access to land for Indigenous land use rights. What makes our concerns ominous is the total land area to be reserved for the project. The development area of existing mining operations is approximately 23 thousand hectares. The Base Mine Extension will gobble approximately 20 thousand hectares, which represents an increase in the area of mining operations greater than 50%. Not only will access by humans be curtailed, also to be affected is access by wildlife and birds.

Additionally, the fact that the Project is an open pit mine immediately brings into focus the clearance of vegetation and loss of natural habitat. Although the Project's reclamation plans and statements indicate the Suncor's pursuit of best practices for land and vegetation

management, the original state of the environment would have been lost. We are worried when forests are cleared because we stand to lose rare plant, animal, and bird species.

When it comes to human health and the potential impact on the social and economic context, Suncor's Project description summary states that "much of the health-related research was conducted in the previous Northern Lights Health Region and is still considered relevant for the Project." As a community organization, we doubt it that the research is still relevant for the Base Mine Extension Project. We would recommend new studies that are specific to this Project. This is because we are deeply concerned about the socio-economic impact of the booms and bursts in the oil and gas economy on the social and cultural wellbeing of Indigenous communities.

The project will compound the wider effects of global recessions on the regional economy. The negative impacts of industrial projects in remote areas, which tend to be ecological and sociocultural and are routinely underestimated by impact assessments, which are borne disproportionately by Indigenous communities, and particularly by Indigenous women. Fort McMurray and surrounding areas, for our part, have gone through practically every recognized boom-town effect, from housing shortages and inflation to family stress and violence, alcohol and drug abuse, and the displacement of early residents.

Nevertheless, we are pleased to see that Suncor, in Item 17 of its Initial Project Description Summary, recognizes the potential impact of the Project to Indigenous people. We welcome this recognition and strongly recommend robust engagement with Indigenous communities like ourselves, to develop an understanding of the concerns of communities. Item 19 of the Project Summary identifies potential impact on the land through landfills and also potential impacts on air quality. We are concerned that the Summary is not detailed in its description of measures to mitigate the impact on the environment and air. Are there any guarantees that industrial activities will not result in "accidents" and spills that could endanger both the environment and human and wildlife health?

The project will mean the loss of access to Beaver Creek reservoir, Ruth Lake, and Poplar Creek Reservoir. The close proximity of the Project, particularly the secondary extraction plant and Upgraders 1 and 2, to the Athabasca River will mean loss of access to this part of the river for fishing and recreational purposes. Also, it raises a concern around potential spills or discharges into the Athabasca River and its tributary system. The entire project has a huge impact on caribou, bison, moose, birds, fish, the water, the forest. It will affect our ability to travel and gather food from the land. From the perspective of Indigenous people, industrial development over the last few decades have been really overwhelming.

The initial estimate is approximately three million metric tons of carbon dioxide equivalent annually over the life of the Project. Are there proposals to cut back on this enormous quantity of greenhouse gas emissions, in the interest of protecting the environment? Water withdrawals for tar sands surface mining operations pose threats to both the sustainability of fish populations in the Athabasca River and to the sustainability of the Peace-Athabasca Delta, jeopardizing the subsistence and commercial fisheries of local aboriginals. Because of industrial developments of a similar nature, our communities are concerned about animal health, because we harvest the available wildlife and have found problems with many animals. Some fish in the water bodies have been found to have tumors and the quality of moose meat is feared to have deteriorated. Therefore, in the area of human health, we have concerns about cancer in Indigenous communities around the oil sands mines.

Oil sands developments consume large amounts of water and energy. Some studies place this consumption at two to five barrels of natural sources and recycled water for every barrel of oil produced by mining. This also results in by-products and contaminated tailings. Other concerns that we have as a community relate to climate change and global warming, acid rain, photochemical smog and other forms of pollution, ocean acidification, displacement and extinction of wildlife, and general resource depletion of forests and water. We understand that there are many issues in the world that are causing these effects. The oil sands, for instance, are of great concern to many these days, as they essentially contribute to each of the above

impacts. One of our concern, as an Indigenous community, is the impact of industrial developments and urbanization on our culture. People have mixed feelings and understandings over the impact. While the job opportunities in the oil sands industry may sound good, however, this exerts pressure on Métis culture.

To sum up, the negative impacts from the program include the loss of habitat land, pollutants released into the air and water, loss of water from nearby waterways, decrease in wildlife populations, more tailings ponds, higher cancer rates among indigenous people, and oil spills through the distribution of these refined oils.