

April 30th, 2021

Impact Assessment Agency of Canada
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RE: Suncor Base Mine Extension Project

On behalf of Métis Nation of Alberta Region 1, please find the following comments in response to the Draft Tailored Impact Statement Guidelines, Draft Indigenous Engagement and Participation Plan, and the Draft Public Participation Plan for the proposed Suncor Base Mine Extension Project (Canadian Impact Assessment Registry File No.: 80521).

After reviewing the draft documents, several oversights were found consistently, throughout all the documents reviewed, in relation to both the language and content presented. The comments provided within this letter have been presented in general terms to address the consistent omissions found, as well as in table format to speak to specific areas and language within each document.

General comments reflect missing language regarding Section 35 and Treaty rights and the inconsistent use of terms for defining Indigenous peoples, appropriate determination of adequacy within the processes, the need for mechanisms to mitigate conflict and ensure meaningful consideration of Indigenous contributions, the contextualization of baseline measurements, and commitment for on-going monitoring and collaboration for end-of-project activities such as reclamation.

Specific comments related to the documents and their respective sections, and recommended language considerations have been attached in table format. The language used in the comment submission that references “the Agency” refers to the Impact Assessment Agency of Canada, and “the Proponent” refers to Suncor Energy Inc.

Reference to Section 35 Rights

Activities within the Impact Assessment and Crown Consultation processes can be seen as the mechanisms to meaningfully include Indigenous people and knowledge that is prescribed under the Canadian Impact Assessment Act. Consistently missing throughout documents related to the project are references to Section 35 rights. In Canada this is often the language that Aboriginal people utilize for consultation purposes. Specificity is important in this area, as these

rights not only mandate consultation, but also precludes non-governmental organizations and other non-profits from engaging under the banner of Aboriginal Consultation. When describing who Indigenous communities, nations, and people are there should be a direct correlation to Section 35 and Treaty rights holders. The terminology when referring to Indigenous communities and peoples should be consistent with all products released in directing the proponent through the regulatory process.

Furthermore, referencing Indigenous “groups” rather than Indigenous nations or communities, depending on the context, undermines the rights of the Indigenous peoples and nations who will be impacted by the project, and minimizes the jurisdictional roles of communities and nations in the Impact Assessment. Indigenous nations, including the Métis Nation and its different levels of governance, are a nation, not a group, and should be referred to as such.

Adequacy of Consultation and Meaningful Engagement

The processes described for supporting the Impact Assessment and Consultation draws on the principals of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), including the expression of Indigenous peoples’ inherent rights. When measuring adequacy, only those who are being consulted, or their designated representatives can decide if the actions and activities are deemed acceptable.

It is essential that communities are being given the opportunity to determine whether consultation is adequate and meaningful to them, on their own terms, not dictated by the Agency or the Proponent. It is not for external parties to say whether consultation with Section 35 rights holders has been meaningful or adequate. There have been countless examples throughout the history of resource development in Canada that illustrate how colonial and Indigenous governments have very different definitions of meaningful and adequate consultation, which has almost exclusively resulted in disadvantages and harm to Section 35 rights holders.

Accommodation is also a part of consultation, and like consultation, the adequacy of accommodation can only be determined by those Section 35 rights holders who are being impacted. If consultation results in the violation of inherent and constitutionally guaranteed rights, without appropriate accommodation, it would be disingenuous at best to declare that consultation adequate.

Need for Community Consultation and Input in the Determination of Measurements, Metrics, and Methodologies

In the case of this project, the Agency is responsible for undertaking consultation, conducting regulatory processes, and determining adequacy and completeness of

information provided by the proponent to make the ultimate decision regarding the Project. These actions can be seen as in conflict with one another, and require mechanisms in place to ensure fairness, transparency and accountability. Developing metrics for decision making, that include how traditional ecological knowledge (TEK) and traditional Indigenous knowledge (TIK), and community contributions are considered, must be an objective and immediate action taken by the Agency. Any metrics established should be developed in consultation with and acceptable to the communities that will be impacted.

Furthermore, communities must have input into all measurements taken and methodologies used over the course of the project, including those related to monitoring and sampling and the location of those activities, the establishment of baselines conditions, and targets for reclamation. Communities have concerns that may not be on the radar of the Agency or the Proponent, and those concerns must be addressed prior to the approval of the project.

Contextualization of Baseline Measurements

There is extensive focus on the gathering of baseline data on the region, including measurements related to air, water, and soil quality. However, from all the guidelines related to these measurements, there is no mention made of the need to contextualize the data gathered against the site's current disturbed state, caused by several factors.

The project is located adjacent to existing operations at the Suncor Base Mine, as well as the Syncrude Mildred Lake facility. Additionally, the area was substantially burned during the 2016 Horse River Fire, and is in close proximity to the urban area of Fort McMurray. All these factors will influence the collection of all baseline measurements, including environmental measures, such as air and water quality, the use of the area by bird and wildlife, and the ability for Indigenous peoples to use the land for the exercise of Section 35 rights. Accurate baseline measurements of the site in a pre-disturbed state don't exist, and can't be collected by conventional sampling techniques devised by western science.

This context is particularly important when it comes to reclamation planning, as a return to the baseline measures for the site would be a far cry from the original state of the land, and would not provide section 35 rights-holders an adequate area on which they could exercise those rights.

Indigenous-Led Monitoring and Reclamation

Commitment to ongoing monitoring of the project area, and to reclamation and restoration of the area following the conclusion of operations is, while positive, only the bare minimum required of the Proponent.

It is a demonstrated fact that when Indigenous nations have control over their lands and are responsible for the care and management of the land, the land is healthier, more sustainable, and better managed. Additionally, Indigenous-led monitoring initiatives are a meaningful accommodation where Section 35 rights are impacted, providing a meaningful opportunity for capacity building within communities, opportunities for the intergenerational transfer of knowledge, and the practice of culture.

Furthermore, as there is no complete picture of the real baseline conditions of the project area preserved in the western science record, Indigenous knowledge held by communities can provide a much better picture of what the goal for the end stage of the project should look like. As discussed above, a return to “baseline” conditions is inadequate, given the already disturbed nature of the site prior to the start of the Project.

In conclusion, our review has shown that there will be substantial impacts to Indigenous communities and their Section 35 rights, should the project proceed as described. As impacted communities, we have provided this feedback proactively, so that the Agency and Proponent can ensure its meaningful inclusion in the final documents. We look forward to working with both the Agency and the Proponent as the regulatory process moves forward in the drafting of the Impact Assessment and consultation activities.

Sincerely,

<Original signed by>

James Cardinal
President, Métis Nation of Alberta Region 1

<Original signed by>

Jason Ekeberg
Vice President, Métis Nation of Alberta Region 1

Attachments: Specific Comments on the Tailored Impact Statement Guidelines
Specific Comments on the Indigenous Engagement and Partnership Plan
Specific Comments on the Public Participation Plan

cc: Métis Nation of Alberta Local Council #2097 Lac La Biche
Métis Nation of Alberta Local Council #2002 Buffalo Lake
Suncor Energy Inc.

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Section & Topic	Comments	Language to Change
1.1 Factors to be considered in the impact assessment	Reference to the protected and proprietary nature of Indigenous Knowledge.	Pg. 2: “Indigenous Knowledge provided with respect to the designated project” -> “Indigenous Knowledge, which is proprietary to the communities who hold it and protected if/until it has been authorized to be released , provided with respect to the project.”
3.3 Regulatory Framework	Explicit statement including the Lower Athabasca Regional Plan and caribou range plans. Missing inclusion of ENGOs that work with Indigenous communities, e.g., WBEA.	Pg. 6: “any relevant land use plans, such as the Lower Athabasca Regional Plan and draft Caribou Range Plans... ”
6.0 Description of Engagement with Indigenous Groups	Language changes throughout the document from Indigenous community/communities to Indigenous groups; consistent terms should be used throughout the document. The document should not refer to Indigenous “groups” as they are nations. . Does not reference s.35 rights as a criteria for engagement.	Replace “Indigenous groups” with “Indigenous nations”.
6.1 Indigenous Knowledge Considerations	Information should be inclusive of historical, contemporary and future resource use when considering Indigenous Knowledge. Language is suggestive and not authoritative. Indigenous Knowledge not publicly available is intellectual property that is required to be protected.	Pg. 13: change wording from “should” to “must”. When utilizing IK it should be expressed that it can also not be weaponized to diminish contributions of other Communities within this impact assessment or future regulatory processes.
6.2 Record of Engagement	“Means” of engagement is unclear - is it referring to a meeting, or how the engagement was delivered?	Pg. 14: rephrase “means” of engagement to provide clarity.

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	<p>Where efforts for engagement were unsuccessful, this information should also be listed as a component subject to an assurance check within the Agency Consultation process to ensure this is adequate/reflective on community aspirations for participating in the Impact Assessment process.</p> <p>Timelines for engagement need to be created in consultation with communities, and with consideration to the capacity of communities, and not arbitrarily imposed by the proponent.</p>	
7.2 Selection of Valued Components	<p>Valued components from Indigenous communities should also include community health and well-being, and shouldn't be prescriptive in the definition of "species of Indigenous importance."</p> <p>Ground and surface water VCs/important intermediate components should specify both quality and quantity.</p>	<p>Pg. 19: "species of Indigenous importance..." → "species of Indigenous importance, including: ..."</p> <p>Pg. 19: addition of "health and well-being of Indigenous communities, such as presence of elders in the community, opportunities to participate in cultural activities, and community safety."</p>
7.4 Effects Assessment Methodology	<p>Assessment methodology should be clear and accessible prior to the start of the project, to be employed during monitoring.</p>	
7.5 Mitigation and Enhancement Measures	<p>Needs specific language detailing the compensation for effects that cannot be mitigated affect s.35 rights holders.</p>	
8.4.1 Atmospheric environment	<p>Selection of receptors should include consideration of community perspectives and knowledge of sensitive areas, including harvesting areas.</p> <p>Mitigation measures should also include mechanisms for</p>	

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	<p>notifying local communities and land users about potential releases.</p>	
8.4.2 Acoustic Environment	<p>Selection of receptors should include consideration of community perspectives and knowledge of sensitive areas.</p> <p>The impact assessment should also include a description of how nearby communities and Indigenous land users will be identified.</p> <p>Should also include a mechanism to notify people of expected project noise, including land users who may be already on the land.</p>	
8.4.3 Visual Environment	<p>“Appropriate distance” for light disturbance quantification should be inclusive of community knowledge and perspectives.</p>	
8.5 Groundwater and Surface Water	<p>Early spring and late summer/fall are not the only times where navigation of waterways is important for Indigenous peoples.</p> <p>Description of current and future uses needs to be validated by the community.</p> <p>There is no methodology specified for quantifying changes to surface and groundwater including the impacts of climate change and cumulative effects.</p> <p>Waterbodies where downstream effects will be described is not a comprehensive list, communities must be included in determining which waterbodies need to be</p>	<p>Pg. 39: change language to include “including a description of possibilities for controlled and uncontrolled discharge”</p>

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	<p>examined.</p> <p>No mandate to examine and estimate the potential for bioaccumulation of pollutants as a result of deposition into waterbodies.</p>	
<p>8.6 Vegetation and Riparian, Wetland, and Terrestrial Environments</p>	<p>For plants of cultural significance, communities and individuals should be given the opportunity to harvest prior to the disturbance of the site.</p> <p>Metrics for measuring biodiversity should include metrics that consider Indigenous Knowledge.</p> <p>Identification of sensitive areas should include knowledge from land users and knowledge holders.</p> <p>Contaminants of concern that are identified should include those that are identified by community members, and should also include contaminants that could be found at levels below reportable thresholds.</p> <p>Selection of plant species for revegetation should be determined in consultation with Indigenous communities, not just composed of existing lists of “plants important to Indigenous peoples,” or plants that were found at the site previously.</p> <p>Vegetation management programs need to be comprehensive and extensive to prevent the establishment of invasive and/or non-endogenous species in the project area.</p>	<p>Pg. 43: “identify any other forest or vegetation resources that may be harvested by Indigenous peoples prior to and during the construction” → “identify any forest or vegetation resources that may be harvested by Indigenous peoples prior to and during the construction, and ensure their harvest by Indigenous land users.”</p>

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<p>8.7 Fish and Fish Habitat</p>	<p>The guidelines state that the absence of fish from an aquatic environment doesn't preclude the use of that environment by fish, but does not mandate the recognition of this in the impact statement or baseline measurements.</p> <p>Measurement of contaminant levels in only "harvested species and their prey" is too specific; levels should be measured in aquatic species more broadly to ensure bioaccumulation models can be adjusted to account for poorly understood trophic interactions.</p> <p>No mandate to describe or estimate the use of fish as land-based food by Indigenous peoples.</p> <p>No mandate to schedule project activities to minimize disturbance during sensitive periods for fish (e.g. reproduction or spawning).</p> <p>No mandate to adhere to Indigenous determined thresholds for adverse effects.</p> <p>No mention of compensation for loss in food sources for land users through habitat change or destruction; compensation for lost fish productivity doesn't specifically include impacts downstream from the project.</p>	<p>Pg. 48: "contaminant levels in harvested species and their prey, with a focus on traditional foods harvested by Indigenous peoples" → "contaminant levels in aquatic species present."</p> <p>Pg. 48: "take into account an examination of the correlation between construction periods and sensitive periods for fish (e.g., reproduction), and any potential effects due to overlapping periods." → "description of how scheduling of potentially disruptive project activities will be scheduled around sensitive periods for fish (e.g. reproduction, migration, spawning)."</p> <p>Pg. 49: "Take into account the tolerance thresholds for potential adverse effects that the Indigenous peoples have identified" → "utilize thresholds that have been determined by Indigenous communities related to adverse effects."</p> <p>Pg. 49: "describe measures and plans to offset or compensate for any loss in productivity of fish populations and fish habitat as a result of the project" → "describe measures and plans to offset or compensate for any loss in productivity of fish populations and fish habitat as a result of the project, including impacts downstream from the project."</p>
<p>8.8 Birds, Migratory Birds, and Their Habitat</p>	<p>Doesn't mandate consideration of indirect impacts of contaminants, including bioaccumulation of contaminants.</p> <p>Mitigation measures do not specify avoidance of habitat disturbance (e.g. logging) during sensitive periods for bird</p>	<p>Pg. 52: "describe the potential direct effects of contaminants and bioaccumulation of contaminants..." → "describe the potential direct, indirect, and cumulative effects of contaminants and bioaccumulation of contaminants..."</p>

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	<p>species.</p> <p>Impact Statement should include maps that show the proximity of whooping crane habitat in relation to the proposed project area.</p>	<p>Pg. 53: “include a description of measures applied during sensitive periods and in sensitive locations such as...” → “include a description of measures applied during sensitive periods and in sensitive locations, such as scheduling disruptive project activities around sensitive periods (e.g. not logging during roosting season)...”</p>
<p>8.9 Wildlife and its Habitat</p>	<p>The Impact Statement should also include maps showing the proximity of caribou range in relation to the proposed project area.</p> <p>Metrics used should include those that consider and utilize Indigenous Knowledge.</p> <p>Impact Statement should also include the risk of wildfire in the area as a result of project activities, and the mitigation measures that will be employed.</p> <p>Effects of increased access to the area should be considered more broadly than access by hunters; should also include the opportunity for increased OHV use, vandalism, and degradation of the environment as a result of the increased access and use.</p> <p>Measures taken based on Caribou Range Plans should be planned in recognition that the range plans are still in draft form, and leave room for change/adaptation.</p>	
<p>9.1 Baseline Human Health Conditions</p>	<p>Community health profiles and determinants of health should be developed in consultation with communities themselves through consultation and engagement</p>	

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	<p>activities.</p> <p>Community health profiles should avoid using deficits-based perspectives and instead recognize the causal factors that contribute to poor outcomes are larger than individual health behaviours.</p> <p>Determinants of health should recognize distal determinants of health (such as colonialism) as influential for all other determinants of health.</p> <p>Sampling of land-based foods should include all land-based foods (e.g., berries, medicines, etc.), not just game.</p>	
9.2 Effects to Human Health	<p>Tolerance thresholds must be determined by communities based on their unique circumstances and resources.</p> <p>Consider reordering the section to introduce social determinants of health at the beginning, as they provide context and influence for all aspects of health discussed in the section.</p>	
10.3 Navigation	<p>Impacts to navigation should be determined through consultation with land users, the language should be reflective of community perspectives.</p>	
10.4 Community Well-Being	<p>All indicators on community well-being should be informed by consultation with communities and take into account their unique perspectives and circumstances.</p>	<p>Pg. 72: “document the consultation undertaken with local, regional, and Indigenous communities as appropriate” – apply this language to all VCs/sections.</p>

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11.1 Baseline Economic Conditions	The impact assessment should define specifically what the terms “local” and “regional” mean and are in the context of the project.	
11.2 Effects to Economic Conditions	<p>Description of potential economic changes should also describe impacts on the potential recovery of fisheries to levels where commercial fishing would become allowable, and on future opportunities for all land-based economic opportunities.</p> <p>Should detail how prioritization in procurement will be conducted to prioritize and encourage Indigenous and/or local businesses.</p> <p>Analysis of changes in property values and cost of living in communities should include a description of fluctuations in the number of workers present during different stages of construction and operations of the project.</p>	
11.3 Mitigation and Enhancement Measures	Financial liability and compensation must be included as it is a necessary condition of the project, and safeguards communities should the project be abandoned.	Pg. 77: “where appropriate, provide details regarding financial liability...” → “Provide details regarding financial liability...”
12.1 Indigenous Physical and Cultural Heritage	<p>When seeking input from communities, the proponent should prepare clear questions to ensure that only relevant and necessary information is provided.</p> <p>The potential for harm as a result of disturbance of cultural sites should be mitigated by employing Indigenous archaeologists as part of the project team.</p>	

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12.2 Current Use of Lands and Resources for Traditional Purposes		Pg. 81: change “ actions by Indigenous groups to restore traditional practices, where applicable”. Pg. 82: remove “the use of the project area by non-Indigenous harvesters”.
12.3 Health, Social, and Economic Conditions of Indigenous Peoples	Any impacts to health or well-being described should employ an Indigenous and holistic definition of health and well-being, as inclusive of mental, physical, spiritual, and emotional health, and this should be stated in the impact assessment. Impacts to the health of Indigenous peoples as a result of the altered use of the land by the project should be framed in ways that speak to the impacts to community health as a result of use of and exposure to the land.	
12.4 Rights of Indigenous Peoples	Any impacts to health or well-being described should employ an Indigenous and holistic definition of health and well-being, as inclusive of mental, physical, spiritual, and emotional health, and this should be stated in the impact assessment. Impacts should be measured using metrics that are established for fairness and consistency.	
13.1 Risk Assessment	Modelling for contaminants should include all contaminants that are released, not just those that are spilled (e.g. including leached into ground or surface water, and released into the air, etc.)	
15.0 Cumulative Effects Assessment	In identifying spatial and temporal boundaries of cumulative effects, the impact assessment should also	Pg. 94: “effects on the practice of current traditional activities...” → “effects on the practice of current

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	<p>identify where thresholds determined by communities have already been exceeded.</p> <p>Sources of potential cumulative effects and follow up on them should be done in consultation with Indigenous communities.</p> <p>Timelines for consultation with Indigenous communities should be established early on to allow adequate opportunity for communities to determine participation.</p> <p>All instances where water is being examined should include water quality and quantity.</p>	<p>traditional activities by Indigenous peoples..."</p>
16.0 Follow-up Programs	<p>Passive language should be changed to active language to ensure that actions proposed are followed through on.</p> <p>Thresholds triggering adaptive management should be explicit.</p>	
16.1 Follow-up Program Framework	<p>Accessibility of data cannot be determined by a one-size-fits-all approach; different communities will have different needs in terms of capacity to ensure that data is accessible. Consultation is required to ensure that access is universal across communities.</p>	
16.2 Follow-up Program Monitoring	<p>Monitoring activities undertaken should be directly linked to community concerns and questions about the adequacy of mitigation and residual effects of the project.</p> <p>Engagement of Indigenous communities in monitoring must include support for collaboration in addition to support for capacity development.</p>	<p>P. 100: "describe engagement with potential affected Indigenous communities and describe measures and commitments to ensuring the sustainability of Indigenous knowledge, livelihood, traditional use, culture and well-being".</p>

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18.0 Description of the Project's Contributions to Sustainability	There is no recommendation to describe engagement with potentially affected Indigenous communities that ensures the sustainability of Indigenous Knowledge.	
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Suncor Base Mine Extension: Specific Comments on the Indigenous Engagement and Partnership Plan

Section & Topic	Comments	Language to Change
1. Introduction	<p>There is no reference or linkage in how they described the communities in relation so s.35 rights holders and/or treaty rights holders.</p> <p>Language suggests that community-specific consultation plans may be developed to support community specific objectives for consultation in relation to this project. If a community believes they are impacted it is the obligation of the Agency to ensure consultation happens.</p>	<p>Pg. 3 include in paragraph 4 language that identifies s.35 and treaty rights holders.</p> <p>Pg. 4 paragraph 1 change language from “may” to “will”</p>
3. Objectives of the Indigenous Engagement and Partnership Plan	<p>The first objective specifically identifies conducting adequate consultation from an Agency perspective, this is not reflective of the content in the introduction that suggests that the IEPP supports meaningful consultation. Consultation is considered a separate process that is being conducted in parallel with the Impact Assessment; by including this as an objective of the IEPP it implies that activities within Consultation and the IA are one and the same. The Agency has 2 roles conducting the IA and Crown Consultations and the objectives should be clearer defined.</p> <p>The evidence to be demonstrated is requested in the IA as a western format. The information provided must be reflective of the community; capacity and working groups with community scientists/technicians for drafting and or/review for adequacy of content within these assessments should be explored.</p>	<p>Pg.5 Include language that affirms/directs commitment from the Agency and/or Review panel shall, prior to making any decision, establish/develop an objective matrix for measuring adequacy of the Impact Statement and also reflect considerations/exclusions when measuring the effects of the project.</p>
5. Engagement and Consultation Tools	<p>The language does not set out a way to provide and/or to create a measurable meaningful process/commitment to demonstrate that the information provided by the Community is valued by the Agency and/or Joint Review Panel or by the final decision makers. Without defining clear questions, it is nearly impossible to</p>	<p>Pg. 10: include additional language that enables providing capacity for communities to retain their own translators/interpreters based on preference.</p>

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	<p>present clear and detailed answers; which raises concerns in respect to procedural fairness within the process and its efficacy.</p> <p>There is a commitment to provide translators but should also include considerations for the communities to be given capacity to retain their own translators etc. who are already trusted within the community.</p> <p>Format in which materials, summaries, information is provided is not specified. Workshops to discuss key documents throughout the process as a tool suggests they will be available where appropriate, there is no clarity on to whom determines what is appropriate; is it the Agency? Community? Budget?</p>	<p>Pg. 10: include additional language on the format of tools provided to be accessible and written with clear/plain language.</p> <p>Pg. 10: bullet 13, remove “where appropriate”</p>
<p>7. Engagement and Consultation Approach</p>	<p>If/when the Agency enters into a Joint Review Panel with the AER the language suggests commitment that the Agency will rely on seeking clarity on Federal/Provincial Consultation activities with the Alberta Aboriginal Consultation Office (ACO). The ACO does not have a policy to Consult with off-settlement Métis, yet Canada has entered into a formal Consultation Agreement with the Métis Nation of Alberta. There are clear differences in the process on determining Consultation with Indigenous peoples; this action should be complementary if at all.</p>	<p>Pg. 10: change language from “seek clarity” to “collaborate” or “compare” approaches & activities.</p>
<p>Table: Phase 2 Impact Statement</p>	<p>Objectives do not provide any commitment on the Agency recording/sharing with communities how comments were considered or not in the final documents. This should be a clear objective throughout all of the stages of the IA.</p>	<p>Pg. 12 include objectives for sharing with communities how feedback/contributions have been reflected/resolved in the process, with rationale on why/why not it was included.</p>

Suncor Base Mine Extension: Specific Comments on the Public Participation Plan

Section & Topic	Comments	Language to Change
4. Distribution list and participants	Group’s residents outside of Fort McMurray and Fort McKay into other surrounding areas. Surrounding areas could be used for residents outside of the towns within the RMWB, if applicable.	Pg. 4 “Residents of Fort McMurray, Fort McKay, (other expanded RMWB community residents from i.e. Anzac, Fort Chipewyan, etc. if applicable) and surrounding areas.
5. Public Participation Tools	<p>No reference to the current detailed media list being used to share information such as Mix 103.7, 97.9, Windspeaker, Fort McMurray Today etc.</p> <p>Social media updates example only includes mainstream twitter, which has limited audience and requires following links if the captions are not well thought out and importance may be lost.</p>	<p>Pg. 4 include bullet: “a detailed list of media tools will be updated and shared within updates provided to the distribution list: current media sources used: listed media”</p> <p>Pg. 5 bullet 2: Include other platforms as examples that are intended to be used such as Facebook, digital community pages etc.</p>