



Willow Lake Métis Nation  
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May 7, 2021

Impact Assessment Agency Canada  
Consultation Operations Division  
160 Elgin St., 22<sup>nd</sup> Floor  
Ottawa, ON K1A 0H3

Attention: Ms. Claudette Bois

**Re: Suncor Base Mine Extension Project - Tailored Impact Statement Guidelines and Indigenous Engagement and Partnership Plan**

Willow Lake Métis Nation (WLM) is providing these comments to the Impact Assessment Agency of Canada (IAAC) regarding the Suncor Basemine Extension Project (the Project) Tailored Impact Statement Guidelines (TISG) and Indigenous Engagement and Partnership Plan (IEPP). WLM would like to acknowledge Suncor and IAAC's support in this process, as well as our appreciation for recognition of the Nation's section 35 rights. Suncor is already a valued partner to WLM, and the Nation intends to work with Suncor throughout this regulatory process regarding Project-specific impacts, mitigation, and follow up in the spirit of our existing agreement.

The Project is located within WLM's traditional territory and based on review of the TISG, WLM recommends the inclusion of the following valued components related to the biophysical environment in the Project impact assessment:

- Surface water and groundwater
- Wildlife and wildlife habitat, specifically including moose, caribou, deer, game birds such as grouse and duck, and species at risk
- Air quality and emissions
- Fish and fish habitat
- Climate change

Regarding Indigenous Nations and peoples, WLM supports the assessment of the following values:

- Land Use, Treaty and Aboriginal/Indigenous Rights, and Culture
- Health

- Social
- Economic

WLM also strongly supports the existing requirement for Indigenous knowledge to be considered alongside western science in the Project impact statement and assessment.

### **Cumulative Effects**

Extensive development has occurred throughout WLM's traditional territory in recent decades. WLM wants to ensure that development plans and decisions are made with full consideration of these cumulative effects, and that regulatory frameworks are in place to proactively manage cumulative effects on WLM rights and land use. WLM recommends that all valued components related to Indigenous Peoples that are identified for assessment be taken forward for cumulative effects assessment, especially those related to current use of lands and resources for traditional purposes; health, social, and economic conditions; and Treaty and Aboriginal rights.

### **Reclamation**

WLM experience indicates that current reclamation standards may not be adequate to return the environment to a state that supports Indigenous land use and rights within a timeframe that is meaningful for the transmission of cultural knowledge. Considering the extent of development in the area and associated cumulative impacts, WLM recommends a strong focus on reclamation standards.

### **Follow Up and Monitoring**

Because there is some degree of uncertainty regarding the efficacy of standard mitigation measures to reduce or eliminate impacts to Indigenous peoples, Nations, and rights, WLM recommends Crown-led follow up and monitoring programs be developed and conducted at a regional level. Existing programs such as the Oil Sands Monitoring program should include a strong emphasis on impacts to Indigenous Nations and rights, including impacts to the biophysical environment, land use, health, social and economic values. WLM anticipates involvement in Project-specific follow up and monitoring programs with Suncor.

### **Closing**

WLM is appreciative of the current impact assessment process and the level of support and engagement from Suncor and the IAAC. The Nation has been engaged early in the planning phase, which allows for significant collaboration in understanding and developing effective mitigation for any impacts to WLM that may result from the Project. Suncor's existing agreement and positive relationship with WLM will support this collaboration. This is a huge improvement for a Métis community that was frequently excluded from consultation only a few years ago.

In closing, WLM would like to express a final concern. We understand that this Project is the first oil sands mine to go through the new federal regulatory process, which requires far more of the proponent and the Crown than in the past. WLM is curious whether the capacity exists to meet these new standards, for all involved parties including Indigenous Nations, Suncor, and the regulatory authorities. It remains to be seen whether it is possible to prepare and review

the necessary information and reach a decision in the legislated timelines, particularly in light of the heightened effects of the pandemic being experienced worldwide right now. We are hopeful that a more rigorous regulatory process and clearer government leadership regarding climate change and Indigenous rights will lead to greater regulatory clarity and help prevent an outcome like what occurred in the case of Teck's Frontier Mine.

WLM supports responsible development and will continue to work with Suncor throughout the regulatory process and beyond to resolve any concerns or impacts related to the Project, and we look forward to ongoing participation in the IAAC process.

Regards,

<Original signed by>

Justin Bourque  
Vice President – CEO  
Willow Lake Métis Nation  
Anzac, Alberta

