



May 7, 2021

Suncor Base Mine Extension Project  
Impact Assessment Agency of Canada (IAAC)  
160 Elgin St, 22<sup>nd</sup> Floor  
Ottawa, Ontario K1A 0H3  
via email: [IAAC.BaseMine-MineBase.AEIC@canada.ca](mailto:IAAC.BaseMine-MineBase.AEIC@canada.ca)

Ms. Chelsea Fedrau  
Project Manager, Prairie and Northern Region  
Impact Assessment Agency of Canada  
9700 Jasper Avenue, Suite 1145  
Edmonton, Alberta T5J 4C3

Dear Ms. Fedrau,

**Re: Suncor Base Mine Extension (BMX) - Draft Tailored Impact Statement Guidelines (TISG)**

The Athabasca Chipewyan First Nation (“ACFN”) Dene Lands and Resource Development (“DLRM”) has reviewed the Draft TISG issued by the Impact Assessment Agency of Canada (IAAC) for the Suncor BMX Project. We are writing to submit our comments on the TISG to IAAC, as well as inform IAAC of the review process established between Suncor and ACFN.

Earlier this year, DLRM reviewed Suncor’s BMX Project Information and identified ACFN’s anticipated impacts of the Project on the ability of ACFN members to exercise their Aboriginal and Treaty rights. In doing so, DLRM also identified whether the anticipated impacts on ACFN were (a) direct Project impacts, or (b) indirect, cumulative, regional impacts. Consistent with the long-term bilateral process that ACFN and Suncor have established, direct impacts of the Project and appropriate mitigation are being discussed with Suncor, whereas **anticipated indirect, cumulative effects** will be brought forward to Canada and Alberta for mitigation and management by the appropriate responsible authority(ies).

This is the context for the following comments submitted by ACFN on IAAC’s Draft TISG for the Suncor BMX Project:

1. The TISG must be sufficiently detailed to require fulsome information to be brought forward regarding both direct, project-specific impacts and indirect, cumulative impacts, to ensure these can be mitigated and managed by the appropriate responsible party.

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2. DLRM will continue to work through the bilateral process between ACFN and Suncor to identify direct, project-specific impacts and discuss appropriate mitigation.
3. ACFN seeks to ensure that the PToR for the BMX Project will allow for fulsome assessment of the following **indirect, anticipated cumulative impacts**, such that these can be effectively mitigated and managed by Alberta or Canada as appropriate:
  - Air Quality
    - Adequacy and validity of air quality models and air quality dispersion models.
  - Climate
    - Changes in climate extremes expected to accompany future climates.
    - Range of climates expected during the life of the project and post-closure period.
    - Climate change effects on water balances.
  - Hydrology, Hydrogeology, and Surface Water Quantity, including water levels in the Athabasca River
    - Inclusion of assessment of options to allow for temporary, seasonal cessation of water withdrawals when the flow in the Athabasca River drops below Aboriginal Extreme Flow.
    - Total loss of water by source for withdrawals that are additive downstream.
    - Appropriate context for significance determinations of small changes in water depth.
    - Surface water balance for the local and regional watershed(s) containing the project.
    - Factors affecting water balance of end-pit lakes.
    - Regional summary of all end-pit lakes that will require filling during the same time period.
  - Water Quality
    - Inclusion of all potentially-affected watersheds, including those that overlap with existing/other oil sands mines and projects, in the Local Study Area, and all sub-watersheds contributing to the Athabasca River in the Regional Study Area.
    - Water quality models, including validation, calibration, and performance metrics.
    - Inclusion of pre-development scenario for surface water and sediment quality.
    - End-pit Lakes and the scale of water quality guidelines that will be considered in the inclusion of end-pit lakes.
    - Cumulative Effects Assessment that includes predicted and actual effects from other projects.
  - Biodiversity and Fragmentation
    - Adequacy and validation of all models, and in particular, biodiversity models.
    - Reclamation plans that consider baseline biodiversity metrics.

- Cumulative effects on terrestrial and wetland vegetation.
- Human Health
  - Effects on the quality of ground and surface water (including snow) used and consumed by Indigenous people.
  - Chemical data of soils, including pre-disturbance organic and inorganic chemicals in local and regional study areas, and regional monitoring of the deposition of organic and inorganic contaminants onto surface soils during the project life and beyond.
  - Acute and chronic effects to wildlife health, of changes to air and water quality and/or contaminants, including effluents, atmospheric emissions and dust deposition, and bioaccumulation of contaminants in wildlife, including those that may be consumed by Indigenous peoples.
  - Consumption of traditional foods, including species consumed and parts of species consumed.
- Traditional Land Use
  - Timely habitat reclamation that supports traditionally-harvested species, that in turn are deemed safe for consumption by communities.
  - Location of springs (mapped) and potable water sources in Local and Regional Study Area.
  - Assessment of navigation that includes changes in water depth at critical pinch points in that Athabasca River, pinch points, and PAD.
  - Assessment of project on ice travel, and ice requirements for safe winter travel.
  - Economic burdens of, and increased time for, travelling further to hunting, fishing, trapping, and gathering opportunities.
  - Impacts of changes in the availability, use, and consumption patterns, including potential for consideration of a pre-development scenario.
  - Impacts of changes in the sensory experience of being on the land, due to noise and change in soundscape, changes in the visual landscape, and odor, and any corollary wellness impacts as a result of these sensory changes.

ACFN thanks IAAC for the opportunity to review and comment on the Draft TISG. This correspondence and the concerns contained herein are not intended to object to the Project, nor to directly or indirectly unduly delay or interrupt the regulatory process. We look forward to working with Suncor on the development of the application for the Project.

Regards,

<Original signed by>

Lisa Tsessaze  
Director, Dene Lands and Resource Management, ACFN

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| [www.acfn.com](http://www.acfn.com)

cc: Chief and Council, ACFN  
Jason Heisler, Regulatory Specialist, Suncor Energy Inc  
Leah Nelson-Guay, Senior Advisor, Indigenous and Community Relations, Suncor Energy Inc  
Meghan Dalrymple, Regulatory and Industry Relations, ACFN DLRM