

Suncor Tailored Impact Statement Guidelines - Disposition Table

Response requested by: **May 18th, 2021**

Department/Agency:	Indigenous Services Canada		
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Comment #	Section	Page #	Issue (i.e. rationale, including if critical or recommended, project-specific or general)	Suggested edit (show original text with track changes)
1	3.2 Project Location	5	Note: ISC is currently working to add lands to reserve in the region.	Distance of the project components to any federal lands and the location of any federal lands within the regional study area, including lands in a reserve or lands to be added to a reserve , within the meaning of subsection 2(1) of the <i>Indian Act</i> ;
2	3.4 Project Components and Activities	6	Please revise the 5 th bullet point under “The Impact Statement must” in order to include <i>the rights of Indigenous peoples</i> .	Highlight activities that involve periods of increased disturbance to environmental, health, social and economic conditions or impacts on Indigenous peoples and the rights of Indigenous Peoples .
3	3.4 Project Components and Activities	6	Additional information is required in the 6 th bullet point under “The Impact Statement must” pertaining to key cultural or archaeological sites.	Include maps of key project components, boundaries of the proposed site with geographic coordinates of major existing infrastructure, proponent lands, and leased properties or lands, adjacent resource boundaries, jurisdictional boundaries adjacent land uses, key cultural and important environmental features.
4	3.4 Project Components and Activities	7	ISC would like the proponent to clearly identify jurisdictional boundaries such as federal lands or municipal boundaries.	Include maps of key project components, boundaries of the proposed site with geographic coordinates, major existing infrastructure, proponent lands, and leased properties or lands, adjacent resource lease boundaries, jurisdictional boundaries , adjacent land uses and any important environmental features.
5	3.4 Project Components and Activities	7	Revise to include economic, and health impacts.	Criteria to identify constraints and how the Project has been designed to accommodate those constraints, such as Indigenous traditional land and water use,

				known traplines, cumulative environmental, economic, health, and social impacts in the region (section 2.2);
6	4.4 Alternative means of carrying out the project	10	Revise to include considerations regarding access to land for traditional activities.	Access to the project site, including access to traditional lands for hunting and harvesting;
7	6.2 Record of Engagement	15	Revise to include economic/social (i.e. Indigenous business and procurement strategies). Work with the communities to develop appropriate strategies (i.e. rating guides for the tendering processes to encourage local labour/business contracts).	A description of how engagement activities by the proponent were intended to ensure Indigenous groups were provided an opportunity to evaluate the project's potential positive and negative effects on their members, communities, and activities, and impacts to rights, as identified by the Indigenous group(s). This could include activities aimed at providing appropriate capacity funding to support the creation and operation of community-driven communication mechanisms that facilitate the flow of information and the advancement of project efforts in each affected Indigenous community, including local contracting.
8	6.3 - Analysis and Response to questions, comments and issues raised	16	Revise to include all diverse sub-groups in 10 th .	Incorporate the perspectives of all segments of the Indigenous groups (e.g youth, women, two-spirited people, individuals with disabilities, and elders) where provided
9	7.2 Selection of Valued Components	20	Revise to include "access."	Indigenous land and resource use (including access and navigation for traditional purposes);
10	7.4 Effects assessment methodology	22	Revise to include Indigenous rights values.	Consider and describe the interactions between the environmental, health, social and economic effects as well as the interaction and interconnectedness of selected VCs while taking into account community and Indigenous rights and values.
11	7.4 Effects assessment methodology	23	Revise to include a more-clear understanding of the noted tolerance thresholds.	Take into account the tolerance thresholds regarding the potential negative effects that Indigenous peoples have

				identified and a description of how these tolerance thresholds were established;
12	7.4 Effects assessment methodology	23	Revise to better highlight the fact that Indigenous knowledge should work inform action.	Describe where and how Indigenous knowledge and input were considered and incorporated;
13	7.5 Mitigation and enhancement measures	23	Revise to Include Indigenous knowledge (note: use of either Indigenous/traditional knowledge should be consistent).	Discuss the effectiveness of each mitigation measure in context of how they affect, or are required to achieve, the predicted changes to the physical environment and prevent adverse effects to the environment from contaminants of concern (e.g. all mitigation accounted for in water quality modelling such as water treatment plants, surface water diversion), including technical/scientific data, Indigenous knowledge and information from analogous projects.
14	8.0 Biophysical Environment	24	General Comment: Revise to include Cultural Values.	Although the requirements set out in these Guidelines are separated by biophysical, health, social or economic conditions and elements, the Impact Statement must consider and describe the interactions between the environmental, health, social and economic effects as well as the interaction and interconnectedness of selected VC while taking into account community and Indigenous rights and cultural values.
15	9.1 Baseline Conditions	63	Revise 4 th bullet to include all vulnerable sub groups. Ensure that these subgroups are considered throughout the entirety of the document where applicable.	Describe the determinants of health selected specifically for Indigenous communities, including for subgroups within them (e.g. Indigenous women, youth, two-spirited people, individuals with disabilities and elders;)
16	9.1 Baseline Conditions	64	Revise 8 th bullet in order to include missing item(s) of concern such as soil, game and plants.	Provide baseline concentrations of contaminants in ambient air, drinking water, soil and tissues of traditional foods consumed by Indigenous peoples and local communities. For collection of

				samples, such as game, and plants , the proponent should work with local Indigenous peoples to where appropriate;
17	9.2.1 Biophysical determinants of health	66	Revise 7 th bullet in order to identify vulnerable populations. Revise within document as needed.	Identify who these vulnerable populations are (e.g. Indigenous women, youth, two-spirited people, individuals with disabilities and elders).
18	10.1. Services and Infrastructure	71	Revise to include better clarification surrounding having a sense of the current needs vs actual availability helps establish a better awareness of the Indigenous communities' situations.	Capacity and ability to meet current needs for emergency services and social services.
19	10.2.1 Baseline Conditions	71	Revise to include potentially include accessibility.	Describe sites, access routes or areas that are used by local populations and Indigenous peoples either for permanent residences or on a seasonal/temporary basis and the number of people who use each site or area identified (include a map(s), where possible), including any potentially impacted transportation routes;
20	10.2.2 Effects to Land and Resource	71	Revise to include consideration for on <u>reserve water use</u> .	Water supplies and water lots, as well as water sources and intakes for agricultural operations, industries, residents, reserve lands and municipalities; and
21	10.4.1 Community well-being Baseline Conditions	71	Revise 3 rd bullet in order to include food sovereignty.	Food sovereignty for Indigenous communities and food security, access to country foods (traditional foods) and baseline perceived quality.
22	10.4.2 Effects on community well-being	72	Revise section to add another point after 7 th bullet.	Describe any food safety concerns from indigenous communities resulting from potential exposure to contaminants.
23	11.1 - Economic Conditions Baseline Conditions	75	It is possible to revise based on considerations for current access to economic programs (wage subsidies, etc)	Provide an overview of the existing employment rates and economic well-being in the study area and impacted communities, including average income, access to social programs , and wage inequality;
24	11.2.3 Contracting	78	Clarify and more accurately specify how the Impact Statement	Evaluate the ability of local businesses to compete for

	and Procurement		will describe opportunities potentially open to Indigenous-based businesses in the region.	<p>project-related contracting or to establish a partnership with the proponent;</p> <p>Describe plans to encourage procurement and contracting opportunities for Indigenous-based or Indigenous owned businesses in the area, and for workers from Indigenous communities, including underrepresented groups such as youth, women, elders and two-spirited peoples.</p>
25	12.0 Indigenous Peoples	80	Revise to include evaluation and reporting.	Take into account the capacity of Indigenous peoples to collect, evaluate and report on information on all aspects identified in relation to the current use of lands and resources for traditional purposes;
26	12.1.1 Baseline Conditions 9.1 Baseline conditions (pg. 63)	82	Revise to include diverse sub-groups.	Describe the determinants of health selected specifically for Indigenous communities, including the subgroups within them (e.g. Indigenous women, youth, two-spirited peoples, those with disabilities, and elders).
27	12.2.1 - Baseline Conditions	81	Revise 5 th bullet to include type(s) of country foods.	Types/list of country foods (traditional foods) that are fished, hunted, gathered, and harvested.
28	12.2.1 - Baseline Conditions	81	Revise 11 th bullet to include hunting, gathering and fishing.	The current use of lands and water bodies in the study area, including for harvesting, hunting, gathering, and fishing , as well as for social and ceremonial purposes, including as defined by Aboriginal and Treaty rights,
29	12.3.2 Effects on Indigenous health, social and economic conditions	84	Revise 8 th bullet to include quality.	Describe effects to the availability, quality , use and consumption of country foods (traditional foods) and potential health impacts of any changes to availability, use and consumption patterns;
30	12.3.2	83	Revise in order to ensure that all three aspects of well-being are	The Impact Statement must: describe the health, social,

	Effect on Indigenous Health, Social and Economic conditions		included: economic, social and cultural (Note: ensure consistency throughout document).	economic effects that the project may have on Indigenous peoples; consideration of how economic boom-bust cycles in remote communities' impact economic, social and cultural wellbeing.
31	12.4.2 Impacts on rights of Indigenous peoples	87	Revise to strengthen language.	The proponent is therefore encouraged to share studies with Indigenous groups in a manner that will be readily understandable, answer questions related to those studies, and consider Indigenous responses prior to assessing the impact on their rights.
32	Section 15.0, 12.0; 12.3.2; Section 15 - 1.3.2 and Section 24 - 1.4 Indigenous peoples and Application of GBA+	81, 87, 120	Revise to include inclusive GBA+ language (and ensure consistency throughout document)	<p>Indicate where input from Indigenous groups has been incorporated, including Indigenous knowledge. To the extent possible, information should be specific to the individual Indigenous group(s) involved in the assessment, and describe contextual information about the members within an Indigenous group (e.g. women, men, elders, youth, individuals with disabilities, and two-spirited people).</p> <p>Apply GBA+ across all health, social and economic effects and document how potential effects or changes to health, social or economic conditions could be different for diverse subgroups, including community relevant subgroups (e.g. women, elders, youth individuals with disabilities, and two-spirited people).</p> <p>GBA+ must be incorporated into all baseline data collection/presentation and effects assessment methodologies as described in the following two sections to understand potential effects to diverse subgroups within the community including women, elders, youth, individuals with</p>

				disabilities, and two-spirited people, etc..
33	13.1.3 Emergency Management	93	Revise to include assistance with potential language barriers.	Explain how the proponent has made and will continue to make an outreach effort to ensure public and Indigenous groups' understanding of the risks associated with this type of project (e.g. include a non-technical report and provide translation(s) in local languages if requested).
34	19.0 Assessment Summary	105	Revise to include assistance with potential language barriers.	The proponent must prepare a stand-alone plain language summary of the Impact Statement in both of Canada's official languages (French and English) and should make available a copy in the language most prominently spoken by Indigenous peoples residing within the proposed project area if requested by a community).
35	21.4 – Application of GBA+	120	Revise to include inclusive language.	As much as possible, the data must be sub-divided by sex, age, gender identity and ethnicity and presented distinctly for each Indigenous group and all subgroups forming their communities.
36	21.12 – Species at Risk – Additional Guidance for biophysical components	135	General Comment: It may be beneficial to add “wood buffalo/bison” to the list of species at risk which may use the project study area and local study area. This species is also classified as a species at risk, and has been noted a species of concern by Indigenous communities which reside in the region. Note: this species is also of cultural significance to the Indigenous peoples which reside in this territory.	