

From: Martin Olszynski <email address removed>

Sent: June 1, 2021 9:17 AM

To: Pineau, Maryse (IAAC/AEIC) <email address removed>; Suncor Base Mine Extension Project (IAAC/AEIC) <iaac.BaseMine-MineBase.aeic@canada.ca>

Subject: Re: Suncor Base Mine Extension - Commencement of the Impact Assessment - Projet d'agrandissement de la mine Base de Suncor - Début de l'évaluation d'impact

Good morning,

I was disappointed to see that the finalized Tailored Impact Statement Guidelines do not reflect any of the evidence-based recommendations reflected in my submission re: adaptive management (available here: <https://iaac-aeic.gc.ca/050/evaluations/proj/80521/contributions/id/53951>). Indeed, there are actually fewer references to adaptive management in the finalized Guidelines as compared to the earlier draft. Neither version contains a clear definition of adaptive management to ensure a common understanding between the proponent, regulators, Indigenous peoples, and other stakeholders in terms of what adaptive management requires.

The Supreme Court of Canada has stressed the importance of transparency and justification in the administration of statutory regimes such as the *IAA* (see *Canada (Minister of Citizenship and Immigration) v. Vavilov*, 2019 SCC 65 at para 14). Consequently, it is incumbent on the Agency to explain how it arrived at its approach to adaptive management in the finalized Guidelines considering the evidentiary record before it.

I look forward to hearing from you,

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