



May 11, 2022

Sent Via Email

Attention: Claudette Bois
Crown Consultation Lead, Crown Consultation Operations Division
Impact Assessment Agency of Canada – Government of Canada
<contact information removed>

RE: Lakeland Métis Community Association – Potential Effects of the Suncor Base Mine Extension Project Canadian Impact Assessment Registry File No.: 80521

Dear Ms. Bois,

At our recent teleconference meetings on Tuesday March 1, 2022 and March 29, 2022, you indicated that you would like to get a sense of how Lakeland Métis Community Association (LMCA) is potentially affected by the Suncor Base Mine Extension Project (the Project).

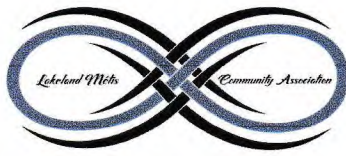
It is still early in the impact assessment process and LMCA has yet to conduct any Project-specific baseline studies to fully identify, assess and mitigate any potential effects to our members' rights, traditional uses of the Project area, or socioeconomic wellbeing.

Further, we have only recently received a draft list of the Valued Components of the Environmental Impact Assessment from the Proponent (at a workshop with all potentially-affected communities on April 19, 2022).

However, we would like to take this opportunity to put on the public record a brief discussion of how LMCA is potentially impacted by the proposed Project based on LMCA's community history, what we already know about our members' socioeconomic conditions and the unique way in which Métis rights are exercised in the Athabasca River valley where the Project is located.

Background Information on Lakeland Métis Community Association

LMCA is one of the founding members of the newly formed Alberta Métis Federation. LMCA represents the interests of approximately 80 Métis community members, most of whom reside in the Lac La Biche area. LMCA is represented by an elected board of directors. LMCA members include Elders, youth, heads of households, working people, entrepreneurs, and students. All members share bonds of family, community, history and the Métis way of life based in part on the exercise of Section 35 rights. Among some segments of our community, particularly among working-age heads of households, Fort McMurray is the place of employment, part-time residence, and in some cases semi-permanent residence.



Historically, ancestors of our community members participated in the fur trade as voyageurs, hunters, carpenters, guides and freighters travelling seasonally throughout the Athabasca River system and navigating the historic Methye Portage route from the 1780s to the 1820s. Métis scrip records (1886-1901) associated with the ancestral families of our community also provide evidence that places our ancestors on the Athabasca River between the Lac La Biche Area and Fort Chipewyan in the second half of the nineteenth century. Historical research that is being undertaken in collaboration with our community Elders suggest the ancestral community covered great distances in their pursuit of furs for trade and to hunt, fish, trap and gather for food and regularly moved seasonally throughout the Athabasca River basin throughout the nineteenth and twentieth centuries.

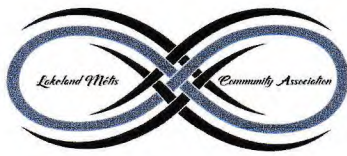
Since 2011, LMCA community members have participated in a series of traditional land use studies for various industrial projects, including the Shell Jackpine Mine Expansion, the Teck Frontier Mine Project and several regional pipeline Projects associated with TC Energy and NGTL, to name just a few. During these interviews, LMCA members mapped places of importance to them for traditional purposes, including hunting, fishing, trapping, gathering and occupying crown land in the pursuit of these activities or for spiritual, ceremonial or traditional purposes.

The results of these studies conducted between 2011 and 2021 indicate that LMCA members practice traditional harvesting activities throughout northern Alberta including the area along the Athabasca River north of Fort McMurray. The findings of previous studies indicated that LMCA members use the Athabasca Basin as a main water route for navigation. Further, the findings suggest that LMCA members exercise their rights to hunt, fish, trap, camp and gather resources for subsistence, cultural, and commercial purposes in areas around Fort McMurray, including within the proposed Suncor Base Mine Extension Project area. LMCA members have documented their visits to the proposed Project areas to hunt, explore and gather plants as recently as the summer of 2021. They noticed that the rugged Poplar Creek and Beaver Creek areas, while heavily fragmented by pipelines, powerlines, ATV trails and industry roads, nevertheless contain many species of interest to traditional harvesters including berries, medicinal plants, food plants and a wide variety of game animals.

This letter outlines some of the ways that this Project could potentially impact LMCA members' rights as Métis people to hunt, fish, trap, and gather for food and occupy crownlands within traditional Métis territory. Further, based on what we already know about LMCA members and the Project, this letter provides some potential effects of the Project to our members' socioeconomic wellbeing.

Potential Project Effects and Impacts

Due to the geographic size and scope of the Suncor Base Mine Extension Project (the Project) which would consist of over 30,000 ha of open pit mine footprint; and considering that Lakeland Métis Community members assert their rights to hunt, trap and fish for food on crownlands along the Athabasca River basin and associated watersheds north of Fort McMurray: Lakeland Métis Community Association is concerned over the Project's direct and adverse impacts on our Métis



community members' rights to hunt, fish and trap for food as well as the Project's direct and adverse impacts on traditional uses such as food and medicinal plant gathering, travel, camping and occupancy for traditional purposes.

In addition to the Project's direct and adverse impacts to our members' rights and traditional land use practices, Lakeland Métis Community Association is concerned about the Project's contribution to cumulative environmental effects including downstream impacts to the Athabasca River system, migratory birds, species at risk such as caribou and woodland bison and impacts on fish stocks in the Athabasca watershed.

Furthermore, having experienced the rapid growth of the oilsands since the 1960s, many of LMCA's community members are concerned about the ongoing cumulative effects of oil sands activity to the socioeconomic wellbeing of Métis people, including to health, income, housing affordability, safety and sense of identity and belonging.

Project Effects on Physical and Cultural Heritage

The Athabasca River basin is part of the regional cultural landscape that is essential for traditional transportation, camping, hunting, fishing and gathering. The Athabasca River was historically the Métis peoples' transportation route during the fur trade that took our people between the Lac La Biche area to Fort Chipewyan and Fort McMurray. Additional oil sands mining along the river near Fort McMurray will create additional aesthetic disruptions to this cultural landscape from deforestation, changes to topography, noise, emissions and additional presence of humans, rendering the lands unrecognizable.

Many Lakeland Métis Community members live and work in Fort McMurray on a seasonal basis although our community is based in Lac La Biche. On these regular visits to Fort McMurray to work or visit friends and family, our members hunt, fish, trap and gather on crownlands immediately north of Fort McMurray. The Project will remove an additional 30,000 ha of viable crownland for hunting immediately north of Fort McMurray in a regional context that is already characterized by massive destruction of crownlands, forests and waterways due to oil sands mining. The Project will disrupt additional waterways and tributaries of the Athabasca River that support fishing, making it difficult to fish near Fort McMurray. The combined effects of this Project and surrounding, existing oil sands facilities will have a direct and negative impact on hunting, fishing, trapping and gathering food and medicinal plants in the Fort McMurray area, resulting in massive infringements on Indigenous rights.

Project-related Changes to Health, Social or Economic Conditions

The Project will contribute to opportunities for economic development and employment in Fort McMurray. However, without more information on the public record about our members' current baseline socioeconomic status, through the Impact Assessment and mitigation process, our community members could be excluded from preferential access to jobs, contracts and mitigation plans. This is because Proponents tend to favour groups with more perceived presence in Fort McMurray based solely on the proximity of the community to the mine project. As such, despite



our members' strong connections to the Fort McMurray area (for work, social, familial and harvesting purposes), our members will have to compete with outside workers and contractors for jobs, access to local services and infrastructure. LMCA maintains that the proximity of the Project to valued components of interest to LMCA is a key criteria to assess the impact to the community and not simply the distance by road between the Project and Lac La Biche.

Project-related Changes to Indigenous Knowledge, Language and Culture

The Project will further interfere with reclamation efforts underway to salvage traditional land use including hunting, fishing, trapping and gathering plants and related Indigenous knowledge of crownlands in the Fort McMurray area and our Métis community's opportunities to teach our youth about the traditional way of life and Indigenous knowledge and culture on crownlands surrounding Fort McMurray.

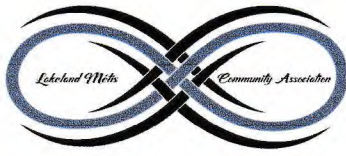
Inter-sectional Project Effects

This Project will favour members of our community with experience working in oil sands mining but will create costs to our members who live traditionally by hunting and fishing on the River, many of whom are Elders. Further, oil sands employment in primary extraction is gender biased in favour of employment of men. Finally, mining culture and the fly-in, fly-out mentality of many oil sands companies and employees is notorious for creating greater risks of gender-based violence to Indigenous peoples who permanently reside in and around resource extraction zones such as Fort McMurray.¹

Sustainability of Human-Ecological Systems and Future Generations

This Project proposes increasing the footprint of the Suncor Operations north of Fort McMurray into some of the few remaining tracts of available crownland in that area. LMCA is concerned that this will further interfere with Métis community's region-wide efforts to promote retention of Indigenous knowledge of crownlands in the Fort McMurray area. Due to the massive scale of ecological destruction of forests, soils, water and wildlife in the mineable oil sands area and the effects on the traditional way of life, culture and socioeconomic status of the Métis community, the bonds of knowledge about the land between generations is at risk. Since much of this knowledge is place-based and requires a pristine environment, the environmental destruction of the Project risks destruction of local Métis knowledge of the Poplar Creek, Cache Creek and Beaver Creek watersheds.

¹Kevin Maimann, 2018, "Link between rural work camps and violence against women is real, researchers say: Experts say that while the "vast majority" of construction workers are not violent, Prime Minister Justin Trudeau's assessment of the situation — maligned by other politicians — is correct." The Star - Metro Edmonton Tue., Dec. 4, 2018 <https://www.thestar.com/edmonton/2018/12/04/link-between-rural-work-camps-and-violence-against-women-is-real-researchers-say.html?rf>



Impacts to Métis Rights as Protected under Section 35 of the Constitution Act

Due to the geographic size and scope of the Suncor Base Mine Extension Project (the Project) which would consist of over 30,000 ha of open pit mine footprint; and considering that Lakeland Métis Community members exercise rights to hunt, trap and fish for food on crownlands along the Athabasca River basin and associated watersheds north of Fort McMurray: Lakeland Métis Community Association is concerned over the Project's direct and adverse impacts on our Métis community members' rights to hunt, fish and trap for food as well as the Project's direct and adverse impacts on traditional uses such as food and medicinal plant gathering, travel, camping and occupancy for traditional purposes.

Approach to Consultation

LMCA is on the list of potentially-affected Indigenous groups and plans to engage with the Proponent to develop an Indigenous Engagement and Partnership Plan. While LMCA has been provided with opportunities to consult with IAAC in measures appropriate to the phase of the Impact Assessment process, engagement with Suncor has been less fulsome.

Suncor has provided some opportunities to share information but so far it has not been clear about how it intends to gather information from the communities for all of its proposed Valued Components. Some of the information it has stated it intends to gather, such as information on the health, wellbeing and safety of Indigenous peoples, requires cultural sensitivity. Further, the socioeconomic complexity of a large oil sands mine Project requires a broad level of engagement and consultation with a wide variety of Indigenous peoples and communities, both rural and urban.

Finally, it is unclear what types of baseline studies the Proponent intends to conduct and whether it is open to Indigenous community-led studies and assessment. For example, LMCA is accustomed to conducting traditional land use studies of Project areas early in the assessment process. For this project, it appears that an LMCA community-specific socioeconomic baseline study and assessment will be required. However, so far, no concrete timeline or agreement has been made in regard to Project-specific research.

Conclusion

As this letter has indicated, LMCA has legitimate concerns about the potential impacts of the Suncor Base Mine Extension Project on its members' Métis rights, traditional harvesting activities including hunting, fishing, trapping and gathering food, on members' use of traditional trails, water routes and transportation corridors along the Athabasca River north of Fort McMurray. LMCA is also concerned about the potential adverse environmental impacts of the Projects on its members' rights, way of life, health and socioeconomic wellbeing. Finally, LMCA is concerned that this Project should be assessed with a great deal of attention paid to the potential socioeconomic impacts to LMCA members. This requires that the Proponent collaborate with LMCA as an equal partner in the appropriate baseline studies and assessments, including studies of traditional use and socioeconomic conditions faced by Métis people in the oilsands.



Lakeland Métis Community Association
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Sincerely,
<Original signed by>

Melina Power (Scoville)
President, CEO
Lakeland Métis Community Association