



March 3rd, 2022

Allisson Lefebvre
Senior Consultation Analyst, Prairie and Northern Region
Impact Assessment Agency of Canada
9700 Jasper Avenue, Suite 1145
Edmonton, AB T5J 4C3

By email: allisson.lefebvre@iaac-aeic.gc.ca

Re: Support Letter for Petition to Designate the Lambert La Ronge Peat Harvest Project Under *Impact Assessment Act*

I am writing on behalf of Northern Region I ("NRI") of the Métis Nation – Saskatchewan ("MN-S"), in my position as Senior Director of Lands and Environment, in response to the Peat's Sake Petition to Designate the Lambert La Ronge Peat Harvest Project under *Impact Assessment Agency*. I am writing in support of Peat's Sake request to exercise discretion under s.9(1) of the *Impact Assessment Act* ("IAA") to designate the proposed Lambert La Ronge Peat Harvest Project (the Project) located in NRI. MN-S is recognized by Canada as the representative of Saskatchewan Métis peoples with a mandate to protect and advance Métis rights.¹

To begin, we would like to acknowledge that the land considered in this letter is the traditional and current territory and Homeland of the Métis (the "Homeland"). It is the future interests of the area that shaped the concerns in this letter.

The sections below provides background and principles as well as supporting concerns for the request to designate. Overall, MN-S has concerns about the project and how it will negatively affect Métis rights.

¹ Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada, signed June 27, 2019; see also Framework Agreement for Advancing Reconciliation between Métis Nation – Saskatchewan and Canada, signed July 20, 2018.

Métis Nation-Saskatchewan (MN-S)

<contact information removed>

metisnationsk.com



Background

The Métis emerged as a distinct Indigenous people and nation in the historic Canadian Northwest during the 18th and 19th centuries. Saskatchewan is a part of the “historic Métis homeland,” which includes the three prairie provinces, Ontario, British Columbia, the Northwest Territories, and the northern United States.

Review Principles

- **United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)**

The MN-S endorses the importance of UNDRIP especially the importance of understanding free, prior and informed consent (FPIC), and with respect to this review is interested in how the project might affect its Homeland.

- **Métis as s.35 Rights Holders**

Métis people are recognized as protected “Aboriginal peoples” under s.35 Constitution Act, 1982, and assert Aboriginal rights protected thereunder, including inter alia rights to harvest and gather animals, plants, and materials for personal, social, ceremonial and trade purposes, rights to self-government, and rights to land (i.e., Aboriginal title).

- **Consultation and Engagement**

The MN-S values consultation and engagement in activities that will have a long-term effect on their interests. This letter takes into account where MN-S can remain involved and/or needs to be involved going forward.

Supporting Concerns

MN-S supports every concern that was noted in Peat’s Sake Petition to Designate Letter which consists of adverse impacts on the rights of Indigenous peoples. This project will also have negative effects on Métis peoples right to carry out traditional activities such as but not limited to hunting, fishing, gathering, etc.

In closing, the MN-S and NRI support and agree with all concerns raised in the designation through the IAA letter from Peat’s Sake. MN-S is looking into the future to ensure lands are adequately safe and secure and suitable for Métis use.



Sincerely,

<Original signed by>

Mark Calette
Senior Director of Lands and Environment
Métis Nation – Saskatchewan

Attach. NRI Supporting Letter to the Minister

cc: Minister Laura Burnouf, Northern Region I, Métis Nation – Saskatchewan
cc: Lazar LaFleur, Local President of La Ronge #19
cc: Sydney Nickolet, Jr. Lands and Consultation Liaison Officer, Métis Nation –
Saskatchewan



Jim Brady Metis Local #19

<contact information removed>

Dear Steve Wilkie,

Thank you for reaching out to the La Ronge Métis Local #19. We do appreciate that the ministry of environment is addressing us directly and welcome your offer to discuss our concerns. However, due to COVID restrictions engagement with Lambert has not been possible in a way that allowed meaningful consultation with Métis Local members.

As outlined in the letter from your ministry from January 10, 2019 Lambert has yet to:

- Arrange meetings by mutual agreement with La Ronge Métis Local #19 elected officials or their formally authorized designate to discuss a consultation plan and an appropriate budget.
- Consult with the La Ronge Métis Local #19 to understand the community's use of the land and resources in the project area and the specific potential adverse impacts of the proposed project on the communities' ability to exercise their Treaty and Aboriginal rights to hunt, fish, and trap for food, and to carry out traditional uses.
- Gather and appropriately document/map information on rights and traditional uses in the project area.
- Consider the information provided by the La Ronge Métis Local #19 on how the community is using the Crown land in the proposed project area for the exercise of rights and traditional uses.
- Work with the community to determine reasonable accommodations to avoid, minimize or mitigate potential adverse impacts on La Ronge Métis Local #19 ability to hunt, fish, and trap for food and carry out traditional uses.

One important point is missing from this list:

- The duty to consult should include request for free, informed and prior consent. Based on our own understanding of the peat mining industry, we do not give our consent. We have identified the following potential concerns, which is by no means a complete list:

- The global importance of protecting peatlands in terms of carbon emissions has to start locally
- The proposed areas infringe on critical caribou habitat (i.e. calving grounds in muskeg areas) as well as travel corridors between important habitat areas
- The proposed areas increase the risk of forest fires to our communities
- The risk of impact on water quality and spawning habitat on fish at Potatoe Lake (via Highway Creek as well as proximity to Potatoe Lake)
- Significantly increased heavy traffic on Napatak Road, traffic increase on Highway #2

- Cumulative impact on the area through i.e. timber harvest, forest fires, roads etc. needs to be taken in account
- Overall length of project: Responsibility to future generation does not allow us to commit to a project that spans 80-100 years
- Lack of understanding of the proponent of intricate value of the proposed area when kept intact (hunting, gathering, fishing, ability to filter water, provide firebreaks, sustainability for future generations)
- Low economic value of proposed seasonal jobs at a high cost to the environment and traditional land uses
- Lack of honesty when talking about the restoration timelines, use of science to dismiss traditional understanding and experience of the land as reflected in email correspondence WSP had had with some of our members
- Some of the impact will be irreversible and can't be mitigated
- Future cost for future generations due to loss of intact environment, forest fire management, endangered species management
- Experiences from other provinces and countries of short-and long-term impacts not taken in account in impact assessments
- Not consistent with federal goals of climate change mitigation
- Not consistent with SK2 Central Woodland Caribou Range Management Plan
- If despite all these concerns and violation of rights the government wishes to proceed, we question how this project and the impact will be monitored: Saskatchewan has no wetland policy in place and no regulations for a project of this scope.

Any more specific impacts to rights and traditional uses by the proposed project will need to be determined in meaningful consultation with local members. We welcome if you will take the lead on this consultation rather than the industry proponent. We suggest that the proponent will provide the funds for us to hire our own consultants which allows us to determine our own process of engagement with our membership as well as our own environmental impact assessment.

As for meeting with you: Meetings via Skype, Zoom or Teams have not been proven meaningful tools to engage with our community members, as many do not have access to proper internet connection or computers. We welcome your offer to meet with us once COVID restrictions have been lifted.

Please do not hesitate to contact us if you wish clarification on any of the above points.

Sincerely,

<Original signed by>

Laura Burnouf – President Metis Local #19_La Ronge
 Cc: Mark Callette _ Duty to consult Minister, MNS Saskatchewan
 Cc: Jeannie Patterson – LLRIB Duty to Consult