

**Attachment 1: Guiding Questions****Suncor Base Mine Extension Project**

Canadian Impact Assessment Registry File No.: 80521

**Potential Effects and Impacts**

1. Please identify any effects of the Project that are of concern to your community. Also please identify any effects that you are aware of that are not listed in the initial project description. *Note: Information on effects and direct and incidental effects as well as effects within federal jurisdiction are defined in section 2 of IAA<sup>1</sup>.*

Louis Bull Tribe is concerned about the rate at which development has occurred in Alberta without reclamation of existing operations – our elders always ask “why are we in such a hurry to get these resources? Why don’t we clean up what is existing before starting a new project?” Louis Bull has undertaken work to assess the current state of Crown land within Treaty 6 through employing the services of ALCES. This work has identified that there is LESS than 5% of intact accessible Crown land within Treaty 6 for the safe, enjoyment of practice of Section 35 and Aboriginal rights, traditional uses and culture.

This loss of land within the Treaty 6 Territory has forced our land users to travel further and further from our Reserve lands, into Treaty 8, in search of the resources we need. This has created conflict in land use between Treaty 6 and 8 First Nations – at this rate there will be NO Crown land left in Alberta. Further to this, we have citizens who reside throughout the province and practice rights across Alberta, we also have a trade network with Treaty 8 First Nations that we rely on to acquire resources that are not available in Treaty 6 (ie medicines)

Our main concern is loss of accessible intact Crown land coupled with Alberta reclamation standards that were not drafted with Indigenous use in mind and render reclaimed land unusable for the practice of rights. We wish to be included to support the Treaty 8 First Nations in protecting what remains for the use of all First Nations and Metis in Alberta

With regard to this project specifically we are concerned about loss of land, contamination to land and water and the inability to remediate tailing ponds back to a pre-construction natural state. Having worked for Indigenous Relations with the Gov of Alberta I was invited to attend the tailings pond focus groups and it was discussed in depth that Alberta and the oilsands operators along with CAPP have NO technology to effectively clean up the tailing ponds; this is quite alarming. Further more, the earthen dam adjacent to the Athabasca River may breach at any time, this too is quite alarming. We are concerned for the health and well being of all that reside down stream of this operation. Alberta had dissolved the “environmental protection” from the mandate of Alberta Environment thereby allowing industry to self regulate in this province; we have no confidence that the current operation is compliant or that Suncor is effectively managing their operation in line with their commitments outlined in the original EIA

Cumulative effects remain an ongoing concern in Alberta, the Lower Athabasca Regional plan was drafted to identify thresholds of impacts to VECs, we are not certain this has been achieved. We have not knowledge of how Alberta has addressed the concerns raised by Alberta First Nations and Metis through land use planning.

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2. Please describe how the potential effects of the Project could result in changes to your community’s:

(a) physical and cultural heritage (e.g. ceremonial sites, burial sites, cultural landscapes)

N/A

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(b) current use of lands and resources for traditional purposes (e.g. hunting, fishing, trapping)

See above

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(c) structures, sites or things of historical, archaeological, paleontological or architectural significance (e.g. artifacts, important historic buildings or symbols)

N/A

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3. Please describe how the Project may result in changes (both positive and negative) to your community’s :
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<sup>1</sup> A link to IAA text can be found here: <https://www.canada.ca/en/impact-assessment-agency/corporate/acts-regulations/legislation-regulations.html>

(a) health, social or economic conditions (e.g. employment opportunities, easier access to goods and services, economic development, accessibility to health-care services);  
Loss of land, loss of medicinal plants, loss of wildlife habitat, contamination of air, soil and water. This project also has the potential to contribute to climate change this will impact our food security, our water security and the health of Canadians as a whole

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(b) Indigenous knowledge, indigenous language or indigenous culture.  
Climate change will impact all of these; if we continue on this path much of our knowledge, language and culture will be impacted if not lost! All of these are connected to LAND without land we don't exist as Indigenous Canadians

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4. Please describe how the Project may result in any change (positive or negative) to :

(a) the intersection of sex and gender with other identity factors (would there be effects to different sub-groups within your community, identified based on factors such as gender, age, race, religion etc.. For example, to women, youth, elders);

MMIW – it has been shown that when resource development projects ramp up in remote areas with high Indigenous populations the rate of MMIW also goes up. This continues to happen today: [2 workers on Enbridge's Line 3 pipeline arrested in sex trafficking sting | CBC News](#)

Operators do not respect the cultural differences of their Indigenous employees and contractors for example; when there is a loss in a community the entire community grieves and gathers, most employers only permit bereavement leave for immediate family only, this is not in line with Indigenous culture or way of life.

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(b) sustainability, considering, for example, the interconnectedness and interdependence of human-ecological systems and the well-being of present and future generations.

Canada should consider how resource development activities contribute to solastalgia (psychological distress that stems from dramatic environmental changes) in First Nations communities. Landscapes that once provided comfort and solace can be so dramatically changed by mining impacts, that a person's "home" is no longer recognisable (Warsini et al. 2014; Glackin 2012; Albrechet et al. 2007; Albrecht 2005). Dramatic environmental changes have been shown to negatively impact human mental health (Horwitz and Parkes 2016). Suncor should consider these long-term mental health impacts the Project will have to those persons who rely on the land for substance and cultural practice.

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5. If you expect the Project may impact your community's rights as protected under section 35 of the *Constitution Act, 1982*, please describe how.

Loss of land, loss of medicinal and culturally significant plants, loss of wildlife habitat – in Alberta these are never put back after a project is complete so they are sometime (often) lost forever. Contamination of water, without water we do not have the resources to carry out rights.

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### Approach to Consultation and Engagement

6. If a federal impact assessment is required for the Project, the Agency will be developing a draft Indigenous Engagement and Partnership Plan and, if applicable, will contact you to seek your comments. Please provide information on how you would like to be consulted by the Agency (for example, does your community have specific cultural practices, traditions or protocols, etc.).

Louis Bull Tribe process is to present new projects to our group of Elders with our consultants (for their technical review) to gather concerns and guidance from the Elders. Depending upon the outcome of the initial review we generally plan to conduct a traditional use assessment but given the intense industrial activity in the region this may not be required. When reviewing projects in Treaty 8 we appreciate the opportunity to canvas our citizens residing off Reserve to ensure that we are capturing all land uses and concerns raised by our citizens.

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7. Please also provide your views on how you would like the proponent to engage your community during all phases of the Project.

Protection of land for our future generations is the goal of the LBT consultation office, as such, we appreciate being included in discussions regarding reclamation that we can be assured that the area will be reclaimed to a standard that will support future Indigenous use. This has not happened in Treaty 6 and the current standard for reclamation does not support traditional uses. We would also like to be notified of incidences where the Athabasca River may be impacted as we take our role as water protectors very seriously and would like to keep our citizens who may reside in the area safe.

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8. If a federal impact assessment is required for the Project, the Agency will act as the Crown Consultation Coordinator and will be responsible for implementing the Duty to Consult. Do you have any views on how the Agency should work with your community in relation to the assessment of impacts on the rights of your community, as protected under section 35 of the *Constitution Act, 1982*?  
Consult early and often, provide support to the tribe through simplifying the process and aiding in meeting deadlines and funding commitments etc.
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