October 18, 2016

Mr. Alex Bolton, Chair
Joint Review Panel for the Teck Frontier Project
c/o Mr. David Haddon
Panel Manager, Review Panels Division
Canadian Environmental Assessment Agency (“CEAA”)
Email: Frontier.Review@ceaa-acee.gc.ca

Dear Mr. Alex Bolton,

Re: Métis Nation of Alberta, Region 1 Sufficiency Review Comments on Teck Frontier EA

Métis Nation of Alberta, Region 1 (“MNA Region 1”) is pleased to provide the Joint Review Panel (“JRP”) for the proposed Frontier Oil Sands Mine Project (“the Project”) with the results of our review of the information submitted by Teck Resources (“Teck” or “the Proponent”) to determine if it is sufficient to proceed to the public hearing. As you will see in the detailed comments below, MNA Region 1 finds that the information submitted by the Proponent is insufficient to proceed to the public hearing phase of this environmental assessment (“EA”) process.

Limited participant funding has required that Region 1 conduct a very limited and focused sufficiency review of information in relation to the highest priority issues to our members only. As such, our comments are not exhaustive of all of the potential gaps in information related to Region 1 impacts. Herein, we focus on two key issues in relation to Métis Nation of Alberta, Region 1 interests as they may be affected by the Project:

(a) socio-economics; and

(b) cumulative effects on water quantity.

To re-iterate our previous concerns¹ which have not been sufficiently dealt with by subsequent information filings by the Proponent, the proposed Project will change local hydro-dynamics (namely in the Lower

¹ These issues have been raised as concerns by Region 1 previously in separate letters:
(b) Letter to CEAA. (2012, June 4). “Public Comment by the Métis Nation of Alberta Region One pertaining to TECK Resources
Athabasca River system and the Peace-Athabasca Delta) and all social, economic, cultural, and ecological systems dependent upon this highly complex, sensitive and impacted environment. Teck’s limited previous engagement with Region 1 in relation to the Project has resulted in no community-specific mitigation of negative effects on Métis land use, health, or enhancement of economic opportunities for the proposed Project. The fact remains that no community-specific information has been used in the analysis of effects for these values nor has there been any genuine effort made by Teck to understand these issues as they are experienced by Region 1 members. Our letter dated December 27, 2013 flagged these concerns to CEAA, stating for example that “[Teck] has not entered into a meaningful conversation to develop detailed plans and policies to address barriers to education, employment and training and business development with the majority of Metis communities in Northeastern Alberta” (p.5). Region 1 also raised concerns in relation to access management and transportation, and lack of involvement in discussions over worker camp design, location, and decision scenarios for worker transport (e.g. fly-in-fly-out (“FIFO”) camp or otherwise) (p.7).

Furthermore, MNA Region 1 has been involved in the development of the CEMA Indigenous Traditional Knowledge Framework Project and points to the final report publically available that provides a good set of principles for including Indigenous traditional knowledge in EAs in the region. We urge the Panel request Teck outline how they have considered and used these principles in their supplemental materials, and what steps they will take to reflect these principles in their supplemental materials and all subsequent stages of the EA, including commitments the Proponent will make for all subsequent stages of Project planning, construction, operations, and closure (if the proposed Project is approved).

Our sufficiency review comments are provided in table format in Appendix 1. These comments are based upon the review of the following documents filed by Teck as part of the EA process:

- Integrated Application (IA; November 2011), focused on:
  - Vol. 1, Section 16 Socio-economic Impact Assessment;
  - Vol. 2, Section 13 Traditional Land Use (Baseline);
  - Vol. 8, Section 6 Traditional Land Use (Effects Assessment);
  - Vol. 8, Section 7.4 Peace-Athabasca Delta, Hydrology (Cumulative Effects Assessment);


• Project Update (June 2015), focused on:
  Vol. 1, Section 16 Socio-economic Impact Assessment;
  Vol. 2, Section 11 Traditional Land Use (Baseline);
  Vol. 3, Section 17 Traditional Land Use (Effects Assessment);

• Response to ERCB, ESRD, CEAA Round 5 Supplemental Information Requests (SIRs; April 2016),
  focused on:
  Response to Questions 42 and 42 (pages 157 – 170) on socio-economics; and,
  Response to Question 45 (pages 176 – 179) on regional study area (RSA) boundaries north
  of the Project Disturbance Area (“PDA”).

• Where any of these documents made references to other documents that required review to verify
  an identified gap, then specific sections within other documents were also consulted. These include
  any of the above three submissions from Teck or any of the following other submissions:
  Response to ERCB, ESRD, CEAA Round 1 Supplemental Information Requests (SIRs; January
  2013);
  Response to ERCB and CEAA Round 2 Supplemental Information Requests (SIRs; October
  2013);
  Response to AER and CEAA Round 3 Supplemental Information Requests (SIRs; October
  2014); and,
  Response to AER and CEAA Round 4 Supplemental Information Requests (SIRs; June 2015).

We understand that five rounds of SIRs have already been issued and responded to and that the EA has
progressed through five years of review. Despite this, Region 1, along with other intervenors in the EA,
have provided the Panel with strong justification for why crucial gaps remain at this stage of the EA and
why Teck must undertake additional work before hearings may begin.

Teck Resources proposed Frontier Project EA process entered the Panel phase in May 2016 involving three
members appointed by the Alberta Energy Regulator (“AER”) and the federal Minister of Environment
(“MOE”) pursuant to the Responsible Energy Development Act (“REDA”) and Canadian Environmental
Assessment Act, 2012 (CEAA 2012), respectively. Our review has raised several key issues that are crucial
for the fulfillment of the Panel’s Terms of Reference (“TOR”), the Environmental Impact Statement (EIS)
TOR, and the governing legislation, including Section 5(1)(c) of CEAA 2012. We request the Panel use the
key issues raised in this cover letter to inform their decision on sufficiency of the EIS/Application materials
and to formulate the Panel’s first set of information requests to the Proponent.
Sufficiency of Socio-economic Information

In general, substantial gaps in the socio-economic assessment have been identified by Aboriginal groups, as recognized by Teck in its comment on page 16.29 of the 2015 Project Update.\(^4\) Despite these serious concerns, Teck has not provided additional information or analyses to address these concerns in any meaningful way. MNA Region 1 re-iterates these earlier concerns and identifies priority remaining sufficiency gaps in the public record for this EA as follows:

- No consideration of effects on traffic or sense of safety when traveling in the region, for MNA Region 1 members and businesses or any other population, as it relates to increased traffic loads and transport of large mining equipment through MNA Region 1’s already impacted core travel corridors;
- No consideration of specific Métis concerns in relation to FIFO transportation design, work camp placement, and related social and economic effects;
- No consideration of Métis community or regional baseline conditions is presented and Teck’s reliance on the 2011 National Household Survey does not accurately represent Métis living outside of settlements;
- Effects characterization is based on indicators that are not culturally appropriate to MNA Region 1 or Métis more generally;
- Lack of any clear Aboriginal hiring and procurement targets or policies.

These are important information deficiencies that should be addressed in any supplemental material required by the Panel prior to its hearings. MNA Region 1 requests that the Panel require Teck to work with our leadership to identify workforce readiness and hiring and procurement targets and policies. We also request that additional data collection and analysis be completed to ensure that training and hiring strategies are culturally appropriate through development of indicators and consideration of baseline conditions describing Métis demographics and workforce profiles in the RSA. See our comments 1 through 9 in Appendix 1 below for more details on socio-economic sufficiency gaps.

Sufficiency of Information on Cumulative Effects on Water and Métis Traditional Use

Important gaps in the Traditional Land Use (“TLU”) assessment for Métis are identified and elaborated upon in Appendix 1. MNA Region 1 identifies priority sufficiency gaps as follows:

- Navigation is not used as a TLU key indicator in the updated cumulative effects assessment, despite serious concerns acknowledged and identified throughout Teck EA materials and previous EAs (e.g. Shell Jackpine Mine Expansion Panel Report, 2013);
- Teck has not committed to involve MNA Region 1 in monitoring or mitigation design in relation to water or traditional use activities; and,

\(^4\) Specifically, Teck recognizes the following categories of gaps have been raised as concerns by Aboriginal groups: (a) the limited scope of the regulatory terms of reference; (b) the level of analysis (e.g., local, regional) does not provide sufficient Aboriginal community-specific information; and, (c) need for more specific information on Project activities and commitments from Teck regarding benefits, including contracting and employment opportunities, logistics (e.g., flight frequencies and shift schedules), and specific policies.
The spatial boundaries used for the assessment are inappropriate and must be redesigned in consultation with MNA Region 1 and members.

In relation to water, it is widely understood that the Peace-Athabasca Delta and the lower Athabasca River and its tributaries have already experienced serious cumulative effects and the proposed Teck Frontier Project and other propose Projects (e.g. Shell Jackpine Mine Expansion, Site C Dam) are likely to cause further adverse impacts. MNA Region 1 requests that the Panel require Teck to work with our leadership to use a VC-centred approach, considering navigation, traditional use, and water quantity, to reassess the cumulative effects assessment on these VCs, as per CEAA Technical Guidance for Assessing Cumulative Environmental Effects under CEAA 2012 (December 2014), using revised spatial boundaries. We also ask that the Panel request that Teck work with Region 1 on monitoring and mitigation design. This is an important information deficiency that should be addressed in any supplemental material required by the Panel prior to its hearings.

See our comments 10 through 12 below for more details on cumulative effects on Métis traditional use and water quantity sufficiency gaps.

Closing

MNA Region 1 agrees with other Aboriginal groups and intervenors that the information provided by Teck in this EA is not sufficient to proceed to the hearings phase. Métis Nation of Alberta, Region 1 urges the Panel to carefully review our cover letter and detailed comments in Appendix 1 and use them formulate your information requests to Teck in the EA of their proposed Teck Frontier Project. Our review finds that additional information must be provided by Teck in the EA to ensure the Panel does not overlook potentially serious adverse effects on Métis interests. This submission provides the Panel with strong justification for why crucial gaps remain at this stage of the EA and why Teck must undertake additional work before hearings begin.

Sincerely,

Original signed

Diane Scoville
President, Métis Nation of Alberta, Region 1

CC:

CC: Daniel Cardinal, Vice President, Métis Nation of Alberta, Region 1
CC: Audrey Poitras, President, Métis Nation of Alberta
CC: Bruce Gladue, Director, Sustainable Development and Industry Relations, Métis Nation of Alberta
CC: Melina Scoville, Executive Secretary, Métis Nation of Alberta, Region 1
CC: Candace Anderson, Crown Consultation Coordinator, Canadian Environmental Assessment Agency  
CC: Robin Johnstone, General Manager, Environment, Community and Aboriginal Affairs, Teck Resources Limited  
CC: Yvonne Walsh, Director, Community and Indigenous Affairs, Teck Resources Limited  
CC: Janais Turuk, Manager, Community Relations, Teck Resources Limited
### Appendix 1. Detailed MNA Region 1 Sufficiency Review Comments on Teck Frontier EA Record

<table>
<thead>
<tr>
<th>No.</th>
<th>Document Reference</th>
<th>Section Number</th>
<th>Sufficiency Gap</th>
<th>Recommended Direction to Panel for Addressing Gap</th>
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<tr>
<td>1</td>
<td>Integrated Application (IA), Sept 2011, Doc. No. 5</td>
<td>16.4.2, pp.16-25 – 16.31</td>
<td>This section presents baseline socio-economic information for the centres of Fort McMurray, Fort McKay and Fort Chipewyan. The data presented is aggregated to the community level and not broken down to adequately to reflect varied sub-populations within these communities. Specifically, there is no baseline information presented for Métis populations within the RSA. Aggregating data in this way avoids characterization of vulnerable populations and the unique socio-economic conditions that characterize Métis people. Notably, lack of understanding of baseline socio-economic conditions of Métis in the RSA seriously constrains the accuracy and credibility of the effects analysis and mitigation effectiveness as it relates to Métis people in the RSA. This method needs to be revised as per good SEIA practice and to ensure the EA conforms to CEAA 2012, s.5(1)(c). For example, the federal Pacific Northwest LNG EA saw CEAA interpret this section of CEAA 2012 to require a nation-by-nation analysis of socio-economic effects (e.g. federal “Aboriginal” IRs dated May 13, 2014).</td>
<td>MNA Region 1 asks that the Panel require Teck to provide additional baseline data for culturally appropriate socio-economic wellbeing indicators for Métis communities within the RSA for the SEIA. The Panel should ask that Teck work with Métis Governments, including MNA Region 1, when development indicators and identifying baseline data sources. Specifically, Region 1 requests that the Panel require Teck to fund an independent, third-party socio-economic baseline study to supplement information on the EA record. New information provided must result in an updated effects assessment and re-design of mitigation measures as they relate to Métis in the RSA.</td>
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<td>2</td>
<td>Frontier Oil Sands Mine Project Update, June 2015, Doc. No. 163 on CEAA registry</td>
<td>16.1.1.1, p. 16-3</td>
<td>This section lists Aboriginal Community studies and initiatives that informed this SEIA. This list does not include reference to any community specific SEIA materials for MNA Region 1 or any of its’ members. It appears as though no Métis or First Nations’ community specific socio-economic baseline or impact assessment work was completed or reviewed with regards to this assessment. It is unclear how it is possible to understand baseline trends or effects on communities for the socio-economic VC using extremely limited and proxy information. Additional information is required to ensure a serious adverse effect is not overlooked.</td>
<td>MNA Region 1 asks the Panel to request Teck provide a list of studies that consider community-specific information for the socio-economic VC (not traditional use or other VCs). If no information on the socio-economic VC was collected, ask that Teck provide this information prior to the hearings phase (also see Comment #1, above).</td>
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|   | **Integrated Application (IA), Sept 2011, Doc. No. 5** | 16.3.7, p. 16-11 | Data sources for the SEIA do not offer an adequate historical baseline upon which to measure change-over-time impacts of oil sands development on social and economic indicators for any populations, including Métis subpopulations in the RSA and LSA. We request that Teck use a baseline of pre-1965* or earlier as an initial point from which to measure change over time and associated socio-economic impacts as part of cumulative effects assessment.  
* This date is a standard relevant to the oil sands area north of Fort McMurray and represents a baseline prior to the commercial production of oil sands in the region (see Report of the joint review panel, Joslyn North Mine Project Total E&P Joslyn Ltd. [www.ceaa-acee.gc.ca](http://www.ceaa-acee.gc.ca), last updated July 2012) |
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<td></td>
<td><strong>Integrated Application (IA), Sept 2011, Doc. No. 5</strong></td>
<td>16.6-1 p. 16.46 16.7.9.1</td>
<td>As outlined in the 2015 Project Update, fly-in/fly-out service will be provided for workers living in Fort Chipewyan and busses will be provided for workers living in Fort McMurray and Fort McKay. However, population growth is estimated at an average of 0.5% per year for Fort Chipewyan and 4.4% per year for Fort McKay. This is based on the RMWB and not specific to Aboriginal populations. Teck states that the &quot;Project is not expected to have a noticeable housing effect in Aboriginal communities because of the operational strategies of workforce fly-in/fly out and construction lodge and operation lodge.&quot; We believe that if the Teck Frontier mine is built, more of our members will want to attain employment with the mine and they may return home to live in their home communities (e.g. Fort McKay and Fort Chipewyan). A potential population increase in these two communities must therefore be credibly modeled, effects assessed, and mitigation adequately designed to address these effects. This concern is not adequately addressed in the IA or any subsequent documents submitted by Teck. A fulsome impact assessment of the FIFO arrangement, as well as bus transportation from Fort McKay, must be conducted on all related socio-economic VCs (housing, transportation, social and health infrastructure, educational facilities, etc), including as they relate to Métis in the region. Teck must be required to provide a credible estimate of the direct, indirect and spin-off impacts of the Project on population levels, housing, services and infrastructure, and quality of life in Fort McKay and Fort Chipewyan in the Project and Planned Development cases, in light of the potential in-migration effect of FIFO work for Métis individuals and families. MNA Region 1 requests the Panel require Teck to involve us in this work.</td>
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<td></td>
<td><strong>Frontier Oil Sands Mine Project Update, June 2015, Doc. No. 163 on CEAA registry</strong></td>
<td>16.1.1.1, p. 16-4</td>
<td>This section lists Aboriginal community concerns that have arisen from consultation since Project disclosure. Key social-related Project impacts of concern to our members are overlooked, including work camp design. Work camps have effects on vulnerable populations (specifically including, but not limited to, Indigenous women) that are not currently planned for in the Integrated Application or any supplemental materials. We ask that the Panel request Teck to consider the social impacts of its' proposed mining and work camp operations and work with MNA Region 1 and our members to determine appropriate mitigation strategies that will reduce social impacts on our women, children and families. MNA Region 1 would like to be involved in the design of these measures.</td>
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Key socio-economic issues, indicators and measurable parameters used to assess proposed Project effects are provided in this section. There is no change in the 2015 Project Update from the original Integrated Application (2011).

Region 1 finds this list incomplete because it does not present Métis worldviews or values and thus fails to address many concerns of MNA Region 1 members.

Additional indicators and measurable parameters must be included in the SEIA in order to better reflect the values, worldviews, wellbeing and issues of concern for Métis people. Examples of culturally appropriate indicators could include, but are not limited to: using a pre-development baseline for basic demographic indicators, food security, ability to harvest and share traditional foods, confidence in traditional food sources, access to and time spent on the land, self-sufficiency, ability to take advantage of employment opportunities, etc.

Please ask that Teck add no less than four additional indicators and associated measurable parameters in the SEIA to better reflect Métis values and perspectives related to well-being and quality of life. MNA Region 1 preferred indicators include (but are not limited to): food security, access to and time spent on the land, ability to take advantage of employment and procurement opportunities, and using a pre-development baseline for basic demographic indicators.

MNA Region 1 requests to be involved in this necessary revision to the SEIA.

Teck notes that potential impacts related to transport of large mining equipment in relation to other operators and stakeholders in the region will occur and that detailed planning for equipment shipping will be addressed in execution planning phase. This is a concern for MNA Region 1. No information is provided on likely effects resulting from this increase in heavy vehicle traffic.

The transport of large mining equipment will take place through the main road transportation networks that our Region 1 members and their businesses use regularly. This transportation corridor is also already heavily impacted by industrial, commercial, and commuter traffic, raising serious concerns over potentially serious to significant effects (not yet identified by Teck) on traffic, access, and sense of safety to Métis and other populations who rely on the affected routes.

The Panel must ask that Teck ensure effects related to increase in vehicle movements in the heart of where MNA Region 1 travel, on key socio-economic indicators (including safety, access, and traffic) are assessed in a fulsome way. This additional information should be submitted prior to the hearings phase.

MNA Region 1 requests to be involved in the revised assessment and the detailed planning phase as it relates to Region 1 transportation issues and concerns.

Teck provides an analysis on labour market readiness for Aboriginal peoples in this response. However, Teck relies on the 2011 National Household Survey, which was voluntary for Métis people and had a very low response rate for those Métis people living outside of Métis Settlements. Thus, To re-iterate the comment provided above (Comment #1): MNA Region 1 asks that the Panel require Teck to provide additional baseline data for culturally appropriate socio-economic wellbeing indicators for Métis communities within the RSA for the SEIA. The Panel should ask that Teck work
the baseline data used in this response is not representative of the Métis population in the RMWB.

with Métis Governments, including MNA Region 1, when development indicators and identifying baseline data sources.

MNA Region 1 requests that the Panel ask Teck to work with our leadership to identify information gaps and sources to ensure a sufficient understanding of socio-economic baseline conditions for Métis people in the RSA is presented to the Panel. Specifically, Region 1 requests that Teck fund a Métis Region 1 specific socio-economic baseline study to supplement information on the EA record.

New information provided must result in an updated effects assessment and re-design of mitigation measures as they relate to Métis in the RSA.

Teck committed to setting Aboriginal employment targets at the agreement negotiation phase, supposedly after the EA is complete. Such a decision does not allow for a fulsome understanding of how mitigations will address potential identified effects and therefore cannot inform either the Panel’s deliberations or subsequent Crown approvals, should they be forthcoming. This is inappropriate. To date, no analysis of Region 1 members’ ability to take advantage of potential Project benefits has been provided. Further, Teck has not yet developed a local hiring and procurement policy.

Teck must prioritize the development of a local hiring and procurement policy and Aboriginal employment targets.

MNA Region 1 requests that hiring and procurement targets be presented and factored into the effects analysis.

Region 1 requests that Teck work with our leadership to support development of hiring and procurement targets and development of hiring and procurement policy as it relates to Métis people. Teck must also work with Region 1 to implement the policy and support MNA Region 1 members in achieving the training required in order to take advantage of employment opportunities.

Teck adopts a 160km radius around a Métis community for assessing effects on Métis traditional use practices (p.17-46). This approach is inappropriate and should be revised with a more appropriate spatial boundary of analysis. In adopting this boundary, Teck has also misinterpreted Alberta Sustainable Resource Development’s Métis Harvesting in Alberta Policy (2010). The 160 km radius was only recently imposed in 2010 and is applicable only for hunting. Alberta has adopted the 160 km designation as a de facto area used by the Alberta government “in the absence of a more definitive description of a community’s historical harvesting area”, as stated in the policy. The study area boundaries for Métis

MNA Region 1 asks the Panel to require the Proponent to reassess effects to Métis in the region as per CEAA 2012, s.5(1)(c) using an appropriate geographic area as agreed with MNA Region 1 and Local Region 1 members participating in this review.
must therefore be updated to better reflect Métis traditional use practices as appropriate for each Local member.

| Page | Frontier Oil Sands Mine Project Update 2015, Document 163 on CEAA registry | 17 | MNA Region 1 members and other Aboriginal groups have expressed great concern for the health and navigability of the Athabasca river, Peace-Athabasca Delta and associated tributaries, notably in relation to limiting access to traditional use locations and reduced traditional use activities overall.

While Teck has recognized this concern throughout the Project Update and Integrated Application, these concerns have not been included in the effects assessment. This is a serious information gap that must be addressed before the hearings may begin.

Teck had the opportunity to address this gap when they conducted a cumulative effects assessment for traditional land use; however, Teck excluded water access and navigation as a key issue in the assessment (see Table 17-1 on page 17-7 of the Project Update). Teck justified this exclusion by indicating the industry sector is not the only contributor to the effect (citing from the Shell Jackpine Mine Expansion Panel Report, 2013, p.219). However, elsewhere in the same Panel Report (2013), several recommendations are made intended to address the concerns raised by Aboriginal groups. These recommendations, many of which are outlined in Canada’s September 2016 Progress Report on the Shell Jackpine Mine Expansion Project Panel Recommendations, are not considered by Teck in their assessment or in any commitments provided. Nor is the fact that any true cumulative effects analysis should adopt a VC-centred approach, as per CEAA’s 2014 Draft Technical Guidelines on Cumulative Effects Assessment. Cumulative effects assessment should consider all potential anthropogenic and natural effects on navigation for the TLU VC. This has never been considered.

MNA Region 1 also points to the need to have navigation as a TLU Key indicator because of the following requirements outlined in the TOR for the EIS (2009): - Section 3.4.2 [D] for Identifying any potential water use conflicts and - 5 [A] d) iv) ongoing impacts to traditional lands and culture.

| Page | Frontier Oil 17.0 and | Teck has not provided adequate information | MNA Region 1 requests the Panel ask Teck

MNA Region 1 asks the Panel to request the Proponent to add navigation as a TLU indicator, consider related Shell Jackpine Mine Expansion Panel recommendations and how Teck plans to ensure these commitments are adhered to for this proposed Project, and update the assessment appropriately.

MNA Region 1 also requests that the Panel ask the Proponent to provide funding and support for a Métis Regional Cumulative Effects Navigation Study for the Athabasca River and associated tributaries in coordination with Métis Local members.
| Sands Mine Project Update 2015, Document 163 on CEAA registry | 6.0 | on Métis involvement in monitoring and mitigation plans for Project-specific and cumulative effects to water flows and navigation.

Hydrologic monitoring will be conducted for water flows for the life of the Project (p. 6-58, 6-59), but does not consider MNA Region 1 member values associated with navigation or any agreed threshold specific to Métis values, including traditional use values for monitoring (p. 17-148).

Further, Teck’s (a) Project Water Management Plan (p. 17-93), (b) adaptive management strategy (p. 6-58), and (c) planned responses to unpredicted flow effects from climate change (p. 6-56) do not discuss how the plan will facilitate Métis or other Aboriginal groups’ involvement. MNA Region 1 and its Members need to be involved in the development and implementation of these plans, strategies, and measures.

While Teck commits to using the Lower Athabasca Surface Water Quantity Management Framework (SWQMF), Teck does not outline how they will use the Aboriginal Navigation Index (ANI). This Index identifies the requirement of multi-stakeholder committees to form and provide direction when particular threshold is met. Teck needs to address if and how they will support the further development of the ANI trigger and management strategy and support MNA Region 1 Members’ participation in this process.

|  |  | to commit to involving MNA Region 1 and our members in monitoring, adaptive management strategy development, and mitigations including reclamation regarding TUS navigation values.

The Panel must also ask the Proponent to identify the specific steps they will take to incorporate and support SWQMF adaptive management strategies.