



December 18, 2024

Isabelle Shelvey
Major Applications and Regulatory Change
Suncor Energy Inc.
150 – 6th Avenue SW
Calgary AB T2P 3E3
<Contact information removed>

**SUBJECT: Approach to Implementation of Transitional Provisions for the
*Impact Assessment Act***

Dear Isabelle Shelvey:

Further to our letter of July 12, 2024 and our discussions since then, the purpose of this letter is to inform you of the Impact Assessment Agency of Canada's (IAAC) approach to the implementation of the transitional provisions of the *Budget Implementation Act, 2024, No. 1*, relative to the *Impact Assessment Act* (the IAA) amendments as they apply to the Suncor Base Mine Extension project (the Project). The relevant transitional provisions are included in Attachment 1.

In accordance with transitional provision 305(2), IAAC has posted a [notice](#) on the Canadian Impact Assessment Registry Internet Site (the Registry) for the Project that it has taken the following action:

- Subsection 18(1) – Provide proponent with a [Notice of Commencement](#) and any documents, including [Tailored Impact Statement Guidelines](#) (the Guidelines) and Plans

In taking this action, IAAC has revised the Guidelines to reflect the amendments to the IAA and clearly focus on areas of federal jurisdiction. IAAC understands that you intend to submit a single impact statement to meet both federal and provincial requirements. You are encouraged to work with IAAC, other federal authorities, and Indigenous communities in developing the impact statement, to ensure all federal requirements are met.

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Further to our letter of July 12, 2024 and your [request](#), dated November 26, 2024, IAAC has replaced the time limit for the Impact Statement Phase, in accordance with transitional provision 305(4). The new deadline for you to provide the required information or studies described in the notice of commencement of the impact assessment is December 28, 2028.

In posting the notice on the Registry, any step taken before the amended IAA came into force regarding the Project is deemed to have been done under the amended IAA. No further action under the transitional provisions of the *Budget Implementation Act, 2024, No. 1*, is required.

IAAC is available to provide an overview of the amended IAA and the updated Guidelines to ensure a common understanding of the changes. If you have any questions or wish to meet, please do not hesitate to contact me by phone at

<Contact information removed>

Sincerely,

<Signature removed>

Kate Witherly
Panel Manager, Review Panels Division

Enclosure(s):

Attachment 1: Transitional Provisions from the *Budget Implementation Act, 2024*

c.c.: Kim Noble, Manager, Crown Consultation, IAAC

Attachment 1: Transitional Provision 305 from the *Budget Implementation Act, 2024*

Designated projects

305 (1) This section applies in respect of a designated project if the Minister or the Agency, during the six-month period that starts on the commencement day, takes a step with regard to that project under any of sections 10 to 59 of the amended Act.

Posting

(2) The Agency must post a notice on the Internet site that indicates the first step taken, the provision under which it was taken, the date on which it was taken and the designated project in respect of which it was taken.

Deeming

(3) Everything that was done before the commencement day with regard to a designated project in respect of which a notice is posted under subsection (2) is, if it may or must be done under the amended Act in respect of the designated project, deemed, as of the day on which the first step is taken, to have been done under the amended Act.

Agency's power

(4) The Agency may, when the first step is taken with regard to a designated project, replace, in respect of that project, any time limit or period established by or under the amended Act by another time limit or period.

Posting

(5) The Agency must post a notice on the Internet site that indicates, for each time limit or period that it replaces, the new time limit or period and the designated project with regard to which that new time limit or period applies.

Clarification

(6) For greater certainty, nothing in subsection (4) affects any power conferred on the Agency under the amended Act to extend or shorten any time limit or period.

Definition of *first step*

(7) In this section, *first step* means the first step taken by the Minister or the Agency under any of sections 10 to 59 of the amended Act in respect of a designated project during the six-month period that starts on the commencement day.