



**VIA EMAIL**

**December 16, 2019**

Impact Assessment Agency of Canada  
200-1801 Hollis Street  
Halifax, Nova Scotia B3J 3N4

**RE: Jeanne D' Arc Draft Environmental Assessment Report**

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To whom it may concern,

I write in response to your correspondence dated November 25th, 2019. The Mi'gmaWei MawioMi Secretariat (MMS) has reviewed the Draft Environmental Assessment Report (the "EAR") and has concerns regarding how the project may affect traditional aboriginal rights & practices, aboriginal commercial fishing, and the Atlantic Salmon population and their habitat. Further, the MMS would like to reiterate that our position regarding offshore exploration and drilling, is that any potential benefits do not outweigh the potential environmental impacts, therefore we do not support such activities.

The EAR does identify possible negative effects on fish habitat, marine wildlife, migratory birds, and interference with commercial fishing, due to routine operations; however, the total extent, long term, and cumulative effects of which are unknown. Additionally, accidents and malfunctions could occur during exploration and drilling causing further adverse environmental damages. While the probability of accidents or malfunctions may be low, when either occur the results are catastrophic and immeasurable; for example, Husky Energy's SeaRose spill lead to a 250,000 litre spill the complete effects of which are not yet known.

The EAR does not consider aboriginal and treaty rights, however, it does consider the Atlantic Salmon population, we agree that newer studies must be completed to identify data-gaps, specifically with regards to Salmon, as any negative impact on Salmon will impact aboriginal and treaty rights. As Salmon is an integral part of Mi'gmaq culture and society, and with some being classified as endangered or threatened, we are of the position that as currently the EAR does not provide sufficient information regarding the full extent of adverse effects on the Salmon habitat, migration, or the general well-being of the population.

Further, as there may be a negative correlation between seismic activity and plankton, which is the very base of the marine food chain, as well as a known impact between seismic activity and fish with air filled swim bladders, such as salmon, we would request that additional research be completed with regards to

seismic testing and negative impacts on marine life. The EAR explains possible impacts on salmon and other marine life, however, there is insufficient research to support the claim the proposed mitigation measures are sufficient, or that the effects of routine activities are low enough to support the proposed projects.

Additionally, we have concerns regarding how underwater noise, light pollution, and additional traffic will negatively impact birds, fish, and other marine wildlife. These three (3) factors may cause significant negative impacts, the full extent of which are not known or understood. Additional research and studies must be conducted in order to understand the full extent of the impacts each of these factors may cause.

Given there are many unknowns regarding the overall impact(s) of a project, with or without a disaster occurring, it would appear naïve on the part of the Agency to state that mitigation measures, and the requirement to compensate commercial fishing would be sufficient to compensation or mitigate any loss. Should there be impacts as a result of a project, with or without a disaster occurring, those impacts may result in harm to a species, and environment that is part of the core of the Mi'gmaq culture and society, those impacts cannot be quantified, and therefore financial compensation would not be sufficient. Additionally, it would appear irresponsible that the Agency would determine there is a low potential for impact on salmon and/or other species, given that we recognize there are many data gaps and unknowns.

Should you have any questions or comments please do not hesitate to contact our office.

Sincerely,

Mi'gmawei Mawiomi Secretariat

PER :

<Original signed by>

Amanda Barnaby

Consultation & Accommodation Manager