Qalipu
FIRST NATION

Newfoundland Orphan Basin Exploration Drilling Project
Impact Assessment Agency of Canada
200-1801 Hollis Street
Halifax, Nova Scotia
B3J 3N4

December 2, 2019

**SUBJECT: Qalipu First Nation Comments on the Newfoundland Orphan Basin Exploration Drilling Program Draft EA Report and Potential Federal EA Conditions.**

To whom it may concern:

The purpose of this letter is to provide comments on the Draft EA report and potential federal EA conditions for the Newfoundland Orphan Basin Exploration Drilling Program.

Qalipu First Nation (QFN) represents approximately 24,000 registered members in Newfoundland and abroad and is made up of 67 traditional Mi'kmaq communities across Newfoundland. As a band, we provide core programs and services to our members, including Natural Resources Management. Specific to the Proposed Newfoundland Orphan Basin Exploration Drilling Program, QFN and affiliates maintain fishing licences overlapping the Project area.

The Draft EA Report and potential conditions prepared by the Agency is thorough and includes important features of the natural and human environment that may be adversely affected by the Project, potential environmental effects of the Project's routine operations, and possible effects on potential or established Aboriginal or treaty rights. Considering the implementation of mitigation measures, the Agency has concluded that the Project is not likely to cause significant adverse environmental effects.

According to the Draft EA, the Proponent stated that in the unlikely event of a blowout, oil spill response measures would be undertaken in a safe, prompt, and coordinated manner. Given the recent spill from Husky's SeaRose FPSO off eastern NL and the lack of transparency between the Proponent, C-NLOPB and the public, QFN would like to see better information sharing in the event of an incident. The public should remain informed throughout any spill response to ensure the Proponent is following proper protocol. Better transparency is imperative in these large-scale projects and we expect to be frequently informed by the Proponent in the event of any accidents or malfunctions.

Based on our knowledge of the Project, QFN supports the Draft EA Report and potential EA conditions provided by the Agency. In doing so, we hope to see safe practice and regulations enforced on the Proponent to maintain and increase environmental protections and reduce the likelihood of adverse effects.

Sincerely,

<Original signed by>

Chief Brendan Mitchell