



**NUNATSIAVUT**  
kavamanga Government

Nunaligninikmik amma Nunamiutanic  
Ujaganik Imaniklu  
**Lands and Natural Resources**

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December 10, 2019

**Subject:** *Comments on Draft Environmental Assessment Report and Potential Federal Environmental Assessment Conditions for the Newfoundland Orphan Basin Exploration Drilling Project*

Dear Ms. MacCarthy,

This letter is a response to the request for comments on the Draft Environmental Assessment Report and Potential Federal Environmental Assessment Conditions for the Newfoundland Orphan Basin Exploration Drilling Project submitted by BP.

The Nunatsiavut Government previously provided comments on this project description. The comments centered around the potential impacts of the project on three Nunatsiavut commercial fishing enterprises (Federal Licenses) in NAFO areas 2GHJ3KL and potential impacts to subsistence/commercial species including cod, and the populations of SARA listed species (including the Atlantic Blue whale and North Atlantic Right Whale) that may migrate through any potentially impacted area within the Marine Zone identified in the Labrador Inuit Land Claim Agreement. The Proposed Conditions suggest details of a Fisheries Communication Plan that the Nunatsiavut Government is in agreement with. The Nunatsiavut Government would like to be included in the Fisheries Communication Plan.

The Nunatsiavut Government also raised concerns around impacts of an underwater blowout and notes that modelling of a blowout was included in the EIS. The NG's concerns centered around impacts to seasonal or temporary coastal residences and on the impacts to commercial and subsistence harvests. On page 82 of the EA Report, the NG notes that that IAA has assessed the impacts to harvest in the context of perceived impacts to food security, noting that there are no traditional harvest areas in the project area, and that traditional food may be a "*small portion of the communities' diet.*" This is an assumption that paints all communities with one brush, whereas different communities have varying degrees of traditional food use in their diets. The assessment of impacts to harvesting for food, social, and ceremonial purposes needs to be broadened to include the importance of social and mental health and the maintenance of indigenous identity. Not only would a blowout impact the 'perceived' harvest, but

also the impacts to a community's connection to their harvest and social use of an area. A deeper consideration of these impacts is required here.

The Nunatsiavut Government also suggested the consideration of climate change in the description of the physical environment as well as in the assessment of impacts. The NG notes that this was included in the description of the physical environment in the Environmental Impact Statement, but not in the assessment of impacts, including cumulative impacts. The impacts of climate change on the VCs and the project itself (such as extreme weather events) should be assessed and included in cumulative effects assessment. Clearly, incorporating climate change into the practice of impact assessment is not an easy task, but should be one that the Impact Assessment Agency encourages, supports, and leads as we enter this new phase of impact assessment.

Thank you for your time and for the opportunity to respond. Please contact me with any further questions.

<Original signed by>

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