



December 6, 2019

VIAEMAIL: iaac.orphanbasin-bassinorphan.aeic@canada.ca

Canadian Environmental Assessment Agency
200 – 1801 Hollis Street
Halifax NS B3J 3N4

Dear Sir/Madam,

Re: Technical Review & Assessment of the Draft Environmental Assessment Report and potential EA conditions for BP's Orphan Basin Exploration Drilling Project

On behalf of Mi'gma'we'l Tplu'taqnn, we are responding to the Draft Environmental Assessment Report for the above project, dated September 2019.

Mi'gma'we'l Tplu'taqnn's primary concern remains how the projects impact migratory species that are of great cultural significance to the Mi'gmaq, including salmon, swordfish, Bluefin tuna, Atlantic right whales, and migratory birds.

Please find enclosed a report from Shared Value Solutions that we are submitting on behalf of Mi'gma'we'l Tplu'taqnn. Based on the report, we highlight the following recommendations in particular:

- 1) The Agency and/or the Proponents should engage MTI and Anqotum Fisheries Resource Centre in designing and conducting a focused Atlantic Salmon research project that seeks to fill data gaps related to Atlantic Salmon use and existence in the Project Area. This should happen before any project approvals and will require dedicated proponent funding.
- 2) Establish a forum and process where Mi'gma'we'l Tplu'taqnn can meet with BP Canada whereby issues and follow-up program decision making regarding the Projects can be brought forward, discussed, and addressed throughout the life of the Projects.
- 3) The Proponents and the Crown must engage in direct, meaningful consultation with all Mi'gmaq First Nations of New Brunswick to ensure that its legitimate concerns are understood and reflected in the Projects EAs and all Follow-up Monitoring Programs
- 4) Involvement of Mi'gma'we'l Tplu'taqnn communities in environmental, socio-economic and cultural monitoring, and emergency preparedness planning.



All of which is respectfully submitted.

Yours in Peace and Friendship,

<Original signed by>

Marcy Cloud
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Mi'gmawé'l Tplu'taqnn Inc.

Cc:

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