



April 30, 2021

Robin Boychuk
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Atlantic Region
Impact Assessment Agency of Canada
200-1801 Hollis Street
Halifax, N.S., B3J 3N4

Re: Atlantic Gold's Fifteen Mile Stream EIS Review

Ms. Boychuk,

I write to acknowledge receipt of the Environmental Impact Statement (EIS) for Atlantic Gold's Fifteen Mile Stream Project. Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) has contracted CBCL to conduct a review of the EIS report and I have enclosed the report as part of our submission. I wish to highlight additional comments, concerns and/or recommendations.

The Mi'kmaq of Nova Scotia depend on the lands, waters, and resources in Nova Scotia and the Mi'kmaw Nation has never surrendered, ceded, or sold title to any of its lands and waters in Nova Scotia. The Mi'kmaq have a title claim to all of Nova Scotia and as co-owners of the land and its resources it is expected that any potential impacts to rights and title shall be addressed. Clearly this project will impact traditional and current use activities including hunting, trapping, fishing, and gathering and compensation must be negotiated with the Mi'kmaq of Nova Scotia.

KMKNO formally requests that should the Fifteen Mile Stream project go ahead, the Impact Assessment Agency of Canada act on its authority to establish monitoring committees related to implementation of follow-up programs and adaptive management plans for the project. This is requested as an accommodation measure and is based on the following rationale:

- The project infringes on the established Aboriginal and treaty rights of the Mi'kmaq of Nova Scotia.
- The proponent has not utilized any Indigenous knowledge in their assessment and as a result there has not been a full analysis of the effects on the Mi'kmaq; significant uncertainty remains in terms of adverse impacts on the health and socio-economic conditions.

Atlantic Gold continues to operate and expand their business in Nova Scotia, the unceded territory of the Mi'kmaq. We are requesting that the federal government establish a Mi'kmaq driven/led environmental monitors program, to monitor the impacts of gold mining in Nova Scotia.

The Proponent shall provide access, during all phases of the Designated Project and within 24 hours of an access request being received, to the Mi'kmaw to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe. The Proponent shall notify the Mi'kmaq of Nova Scotia in a timely manner if access to the mine site, or any part thereof, must be prohibited for safety reasons.

We look forward to further consultation on this matter.

Yours in Recognition of Mi'kmaw Rights and Title,

<Original signed by>

Twila Gaudet, B.A., LL.B.
Director of Consultation
Kwilmu'kw Maw-klusuaqn Negotiation Office

c.c.:
Beth Lewis, Consultation Advisor, Nova Scotia Office of L'nu Affairs.

