

Responses to Comments on the Draft Agreement to Conduct a Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador

November 20, 2018

Author	Subject	Comments	Responses
Oceans North	Advance 2030 – cumulative effects of wells	Clarification of the relationship to the Advance 2030 and the proposed 100 exploratory wells - unclear if these wells will be within the REA area or across the larger CNLOPB regulatory area. Important consideration given to the cumulative impacts depending on the proximity of each of the exploratory wells.	<p>The wording in the whereas clause in the Agreement refers to the Government of Newfoundland and Labrador's plan to encourage the drilling of up to 100 new exploratory wells by 2030 (as part of the Government's Advance 2030 Plan). These exploratory wells could be anywhere in the Canada-Newfoundland and Labrador Offshore Area, not confined to the Study Area for this Regional Assessment.</p> <p>Since it has caused confusion the clause was changed in the Agreement.</p>
Ecojustice	Application of Regional Assessment	Seek assurances that the results of this Regional Assessment will not be used to replace environmental assessments of exploratory drilling and seismic exploration, which must be conducted specifically in relation to particular sites.	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment</p>

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			<p>that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Equinor Canada Ltd.	Application of Regional Assessment	The Draft Agreement should make it clear that the Regional Assessment can and ought to be used to support determinations by responsible authorities regarding the impacts of offshore exploration drilling projects in the applicable area – as required under both CEAA 2012 and the IAA.	The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.
Canadian Association of Petroleum	Application of Regional Assessment	Suggest completion of a Regional Assessment should eliminate or cut back substantially on any project-specific assessment requirements within the Regional	The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental

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Producers		<p>Assessment area. If there are still substantial project-specific assessment requirements then the Regional Assessment process will only result in duplication and will not improve efficiency, which is a stated objective of governments in the draft agreement. Canadian Association of Petroleum Producers therefore requests additional information related to how the Regional Assessment will be used once completed and what, if any, project-specific assessment requirements will be implemented for future exploration programs in the Regional Assessment area. Considers the Regional Assessment as tool for exclusion and/or substitution for an assessment under the IAA. Wants an evergreen document that continues to be updated with relevant information on science, technology and traditional knowledge.</p>	<p>assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Nunatsiavut Government	Application of Regional Assessment	<p>Acknowledgement of Section 5.9 and encourages the development of a digital, spatially-based system to house data. Suggests an ongoing database be created to house data gathered from project-based environmental assessments, monitoring programs, and strategic</p>	Noted.

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		environmental assessment updates.	
Husky Energy	Application of Regional Assessment	<p>Provisions for updates should be included in the terms of reference for the Regional Assessment, as they are for Environmental Assments under the C-NLOPB.</p> <p>Changes in species at risk, protected areas and commercial fishing for example, must be reconsidered periodically to ensure mitigation and monitoring requirements are appropriate.</p> <p>Likewise, we can anticipate changes in drilling technology that may require an update to mitigations or monitoring requirements. Periodically, proponents should demonstrate they have considered any new information and whether the mitigations proposed in the Regional Assessment are appropriate.</p>	<p>See Appendix D, section 2.4. - ...the Committee will also provide its advice on the feasibility of and how best to develop, structure, maintain and keep up to date such a system, including how the system could include all pertinent spatially-derived information and knowledge on the Regional Assessment area including.</p>
Ecojustice	Application of Regional Assessment	<p>The draft Agreement should require that the Committee (1) ensure that oil and gas is excluded from existing or planned marine protected areas (including fishery closures, Areas of Interest and Other Effective Area-based Conservation Measures; and (2) identify areas of particular sensitivity that require designation as protected areas in which no drilling will be permitted, even if no protection is currently in place or under consideration.</p>	<p>It is anticipated that existing and proposed protected and special areas, and potential environmental effects on these resulting from future exploration drilling in the Study Area, will be a key area of focus for the assessment.</p> <p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling</p>

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			<p>projects within the region.</p> <p>It is not appropriate for the Agreement to speculate on and attempt to specify the eventual findings and outcomes of the Regional Assessment.</p>
Wolastoqey Nation NB	Baseline	Indicate that in section 1(a) Appendix C: The description of the environment should include a characterization of the environment prior to any disturbance due to industrial development; consideration of pre-development baseline.	<p>The description of the environment in the Regional Assessment will focus primarily on describing the existing (current, baseline) environmental conditions, which will also be based on the availability and age of relevant environmental information and other factors. Although it may not be possible, based on existing information and analytical capabilities to fully characterize “the environment prior to any disturbance” the assessment will consider whether and how these existing environmental conditions have been affected by, and therefore reflect, past and on-going effects. This will include those resulting from natural and anthropogenic disturbances (e.g., climate change, fishing activity, past and on-going oil and gas activity, general marine traffic), where this is possible and feasible based on existing and available information.</p>

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Nutashkuan Innu First Nation	Climate Change	Climate change should be explicitly addressed and given a more prominent place in this agreement, rather than being relegated to the 6th spot in the list of factors to be considered. We recommend making it the primary element justifying the planned regional assessment.	The extent to which offshore exploration drilling hinders or contributes to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change is one of the factors to be considered in Appendix A. These are not in order of any priority.
Ecojustice	Climate Change	<p>Recommend that Appendix C, Factors 1(g) and (h) should be expanded to expressly require the Committee to consider how the impacts caused by the exploration, extraction, production, processing and end uses of the oil and gas hinder Canada's ability to meet climate change commitments.</p> <p>A full climate change assessment should be conducted in relation to the cumulative effect of emissions from all of these activities.</p> <p>The list of factors should include a requirement to consider impacts on Canada's marine protection obligations under the Convention on Biological Diversity and commitments to protect at-risk species under the Species at Risk Act and other relevant legislation.</p>	<p>No change – kept same to be consistent with new proposed legislation language under Bill C-69.</p> <p>The extent to which offshore exploration drilling hinders or contributes to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change is one of the factors to be considered in Appendix A.</p> <p>The list of factors also includes the extent to which the effects of offshore exploration drilling hinder or contribute to the Government of Canada's ability to meet its environmental obligations.</p>
Canadian Association of Petroleum	Committee	Does not want a committee established.	Under CEAA 2012 the Minister may establish a committee to conduct a study of the effects of existing or future physical activities carried out

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Producers			in a region and to establish the terms of reference and appoint the committee. The Regional Assessment is being conducted under CEAA 2012, therefore a committee is required pursuant to the legislation.
East Coast Environmental Law	Committee	The Agreement should more clearly define criteria for the membership of the Regional Committee. The Committee cannot reflect industry bias.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Wolastoqey Nation NB	Committee	Each Indigenous group should have an Indigenous representative with knowledge or expertise in Indigenous and Treaty Rights and Indigenous knowledge, on the Joint Committee.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Wolastoqey Nation NB	Committee	Has there been any consideration of including an international representative on the Joint Committee such as United Nations given the Regional Assessment study area is outside of Canada's Exclusive Economic Zone?	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Miawpukek First	Committee	The Committee must include Mi'kmaq governing body	See section 3 Constitution of the Committee.

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Nation		representatives, preferably Miawpukek First Nation representatives.	The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Mi'gmawe'l Tplu'taqun	Committee Task Team Technical Advisory Group	Concerned that Indigenous Peoples are not full partners in this Regional Assessment with the Government of Canada and the Province of Newfoundland and Labrador. Indigenous Groups should have direct representation on the Joint Committee, the Task Team, and the Technical Advisory Group. Otherwise this is not a true joint environmental assessment.	<p>See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment. The Technical Advisory Group members may be from within or outside of government and are to have knowledge or experience relevant to the Regional Assessment.</p> <p>The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis.</p> <p>Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should any group, person or department feel that you have experience or expertise that the Committee or</p>

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			Task Team may require please let us know.
Nutashkuan Innu First Nation	Committee	Need for committee member impartiality.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Nutashkuan Innu First Nation	Committee	Why not have committee formed earlier and formed at the signature of the agreement?	The Committee will be appointed once the Final agreement is signed by the Ministers.
Nutashkuan Innu First Nation	Committee Task Team Technical Advisory Group	Organizational structure difficult to understand, no links between technical group and committee.	The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment. The Task Team is made up of public servants from the Agency, the Canada-Newfoundland and Labrador Offshore Petroleum Board, Natural Resources Canada and the Newfoundland and Labrador Department of Natural Resources. It will support the Committee. The Technical Advisory Group members may be from within or outside of government and are to have knowledge or experience relevant to the Regional Assessment. As the Task Team

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			<p>requires expertise, it will seek out people in those disciplines to provide that expertise and they will make up the Technical Advisory Group. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.</p>
Nutashkuan Innu First Nation	Committee	Recommend at least one Indigenous representative should be on the Committee.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Mekap'sk Mi'kmaq Band	Committee	Request Indigenous representation on the Committee be included in the draft Agreement to reflect the Indigenous governments who have an interest in and exercise	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in

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		jurisdiction over the Regional Assessment Study Area.	consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Kwilmu'kw Maw-Klusuaqn Negotiations Office (KMKNO)	Committee	Must include Indigenous Decision Maker as a representative on the Committee.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Newfoundland & Labrador Oil & Gas Industries Association	Committee	At least one of the co-chairs must be a Newfoundlander and Labradorian who is familiar with the offshore industry.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Ecojustice	Committee Technical Advisory Group	<p>The Committee and Technical Advisory Group members must be independent from industry, government and the C-NLOPB. Members should include Indigenous representation, as well as academics or independent scientists with marine expertise.</p> <p>Science advisors to the Committee and the Technical Advisory Group should be selected on the basis of merit and must be prepared to give independent science advice.</p>	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment. The Technical Advisory Group members may be from within or outside of government and are to have knowledge or experience relevant to the Regional Assessment. Information provided by

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			any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information.
ExxonMobil	Committee	Supportive of a Task Team and Technical Advisory Group – not supportive of a Committee (not sure of the value of the additive role)	Under CEAA 2012 the Minister may establish a committee to conduct a study of the effects of existing or future physical activities carried out in a region and to establish the terms of reference and appoint the committee. The Regional Assessment is being conducted under CEAA 2012, therefore a committee is required.
Engineers Canada	Committee Technical Advisory Group	Engineers Canada feels strongly that a professional engineer should be included in both the proposed Technical Advisory Group and the proposed Committee. It is imperative that all individuals providing engineering services (presumably related to the Regional Assessment), be licensed by one or more of the provincial and territorial engineering regulators.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should any other group, person or department feel that they have

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			experience or expertise that they think the Committee or Task Team may require please let us know.
Elsipogtog First Nation	Committee	Concerned there is no Indigenous involvement on the Committee responsible for undertaking the assessment. Need Indigenous representatives on the Committee to conduct the Regional Assessment of exploratory oil and gas drilling, that may impact Indigenous groups, as Canada committed to in Bill C69. Also to ensure Indigenous Knowledge and perspectives are incorporated into the Regional Assessment.	See section 3 Constitution of the Committee. The Committee will be appointed by the Minister of Environment and Climate Change in consultation with the other Ministers. The Committee will have knowledge or experience relevant to the Regional Assessment.
Canadian Association of Petroleum Producers	Costs	Want Agency and NRCan to cover all costs. Do not want costs incurred by the C-NLOPB to be covered by Industry.	The C-NLOPB operates on a cost-recovery basis in accordance with its Cost Recovery Guidelines. As a result, costs associated with C-NLOPB involvement in the Regional Assessment process will be cost-recovered from industry.
ExxonMobil	Costs	ExxonMobil believes federal government (CEAA and NRCan) should cover all costs associated with the Regional Assessment and that costs should not be passed on to industry.	The C-NLOPB operates on a cost-recovery basis in accordance with its Cost Recovery Guidelines. As a result, costs associated with C-NLOPB involvement in the Regional Assessment process will be cost-recovered from industry.
Elsipogtog First	Cumulative Effects	Regional Assessment is important for evaluating and	Noted. Appendix A includes factors to be

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Nation		managing the cumulative effects of multiple projects.	considered, including “any cumulative effects that are likely to result from offshore exploratory drilling in combination with other physical activities that have been or will be carried out”.
Canadian Association of Petroleum Producers	Decision	Regional Assessment decision making process must be transparent. Want to know the responsibility of the Minister once the report is received and include clear timelines related to the decision making process.	Under CEAA 2012 the Minister must make the report available to the public in any manner she considers appropriate to facilitate public access to the report and must advise the public that it is available. There is no decision-making process under CEAA 2012 for regional assessments.
Miawpukek First Nation	Design	Request to identify in section 4.4 or other sections in the Draft Agreement that Miawpukek First Nation will be engaged and consulted about the Regional Assessment design, and have its comments and requests meaningfully considered by the Committee.	Miawpukek First Nation will have the opportunity to participate in the Regional Assessment. Funding will be administered by the Agency and made available for participating Indigenous communities, stakeholders and the public in the Regional Assessment process. Any information and comments submitted by Miawpukek First Nation during the Regional Assessment process will be considered by the Committee/Task Team.
Nutashkuan Innu First Nation	Environmental Effects	How will Regional Assessment measure effects in the Economic Zone (EEZ)?	The proposed Regional Assessment Study Area, as defined in the Draft Agreement (Appendix D), includes marine areas that are located both within and beyond Canada’s EEZ on the outer continental shelf. The Regional

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			<p>Assessment will consider and describe potential environmental effects resulting from future exploratory drilling and associated activities that fall within the scope of the assessment, both within and outside the EEZ.</p>
<p>Canadian Association of Petroleum Producers</p>	<p>Exclude Exploration Wells from the Designated Project List</p>	<p>Wants offshore exploration drilling off the Project list as it is short-term and subject to specific environmental requirements and mitigations prior to approval by the Offshore Petroleum Board.</p>	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures

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			through the adoption and application of standard information requirements and mitigation measures.
ExxonMobil	Existing information	ExxonMobil encourages the use of data and information collected through existing Environmental Assessments	See sections 4.5 and 4.6 - The Regional Assessment is using information from previous assessments including Strategic Environmental Assessments.
Newfoundland & Labrador Oil & Gas Industries Association	Existing Information	Regional Assessment should consider previous Strategic Environmental Assessments so as to not duplicate work and ensure a timely process	See sections 4.5 and 4.6 - The Regional Assessment is using information from previous assessments including Strategic Environmental Assessments.
Oceans North	Existing Information	<p>Consideration of Canada's commitment to protecting at least 10% of its ocean and coastal environments by 2020 & Sustainable Development Goals 14.</p> <p>Consideration of coral, sponge and seapen distributions and concentrations.</p> <p>Consideration of conclusions of CSAS response to Flemish Pass and Eastern Newfoundland Offshore Exploration Drilling Programs</p> <p>Consideration and engagement of Marine Spatial Planning Research undertaken by EU-ATLAS Project</p>	These issues and associated information sources will be considered in the planning and completion of the Regional Assessment.

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		<p>Consideration of peer reviewed science and grey literature</p> <p>Consideration of Transboundary Strategic Environmental Assessments & Cross Sectoral Collaboration</p>	
Equinor Canada Ltd.	Existing Information	Recommendation to review the Canadian Council of Ministers of the Environment (CCME) guidance on the objectives of Regional Assessment to ensure consistency and alignment.	These and other relevant guidance documents will be consulted and considered in the planning and completion of the Regional Assessment.
Nutashkuan Innu First Nation	Existing Information	Recommend the draft Agreement be re-written for more clarity and precision considering other studies and initiatives.	The Regional Assessment will include the identification, review and consideration of all applicable and available information and knowledge sources (and associated mapping) related to the environmental setting of the region (including its ecological characteristics and diversity) and the potential environmental effects of exploratory drilling and associated activities.
Oceans North	Existing Information	<p>Recommend the Technical Advisory Group consult with DFO regarding its June 2018 CSAS process that summarizes the impacts of oil and gas drilling on areas that are considered Sensitive Benthic Areas, including both the science advice and background documents prepared for that meeting.</p> <p>Also recommend using the information provided in the</p>	These and other information sources and documents will be consulted and considered in the planning and completion of the Regional Assessment.

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		January 2018 CSAS process on the use of scientific surveys in fisheries closed areas and MPAs.	
Ecojustice	Existing/New Information	In addition to existing information, the Committee must be empowered to seek out, commission and receive new information, including existing studies pending publication, and future studies, to eliminate the current information gaps in the Study Area.	The Committee will identify and address knowledge gaps and, as appropriate, make recommendations to address gaps.
Nutashkuan Innu First Nation	Existing/New Information	Why is there no reference to the Strategic Environmental Assessment of 2014?	See section 4.6 - The Regional Assessment is using information from previous Strategic Environmental Assessment.
Nunatsiavut Government	Existing/New Information	Notes Section 4.6 states that "existing information and knowledge includes, but is not limited to, any Strategic Environmental Assessment..." Nunatsiavut Government understands that a Strategic Environmental Assessment is intended to assess the impacts of a specific programme or policy (in this case, oil and gas development) to an area. Suggests the Draft Agreement state "why the REA is required above what an update to the Eastern Newfoundland Strategic Environmental Assessment could accomplish."	The C-NLOPB completes Strategic Environmental Assessments for defined parts of the Canada-NL Offshore Area, the results of which are considered by the Board in determining whether further exploration rights (licences) should be offered in whole or in part within the Strategic Environmental Assessment Study Area in question. The Strategic Environmental Assessment for the Eastern Newfoundland Offshore Area was completed in 2014, and there are currently no updates to that Strategic Environmental Assessment in progress or planned. Regional Assessments, on the other hand,

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			<p>examine the known and potential effects of existing and future activities in a region. The results of a Regional Assessment that is conducted in accordance with the Regional Studies provisions of CEEA 2012 are considered by the Canadian Environmental Assessment Agency when determining whether a specific designated project within the region requires a project-specific environmental assessment, and if so, in helping define the specific nature and scope of that assessment.</p> <p>This Regional Assessment is therefore intended to help improve the effectiveness and efficiency of the environmental assessment process as it applies to exploratory drilling and associated activities in this region, while at the same time ensuring the highest standards of environmental protection continue to be applied and maintained for future projects.</p> <p>The rationale for and planned use of the Regional Assessment, and its relationship to the referenced Strategic Environmental Assessment, will be described in the Regional Assessment report.</p>
Nutashkuan Innu First	Existing/New Information	Recommend that the Regional Assessment include mapping of all types of knowledge, most importantly	The Regional Assessment will include the identification, review and consideration of all

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Nation		ecology/ecosystems to understand the diversity.	<p>applicable and available information and knowledge sources (and associated mapping) related to the environmental setting of the region (including its ecological characteristics and diversity) and the potential environmental effects of exploratory drilling and associated activities.</p> <p>The Regional Assessment will take an “ecosystem approach” to the analysis, fully recognizing the importance and interrelationships of its various biophysical and socioeconomic components, as well as the dynamic nature of such systems and their responses to disturbance.</p>
Nutashkuan Innu First Nation	Existing/New Information	Difference between Strategic Environmental Assessment and Regional Assessment, how does it differ from past assessments?	<p>The Canada- Newfoundland and Labrador Offshore Petroleum Board completes Strategic Environmental Assessments for defined parts of the Canada-NL Offshore Area, the results of which are considered by the Board in determining whether further exploration rights (licences) should be offered in whole or in part within the Strategic Environmental Assessment Study Area in question. The Strategic Environmental Assessment for the Eastern Newfoundland Offshore Area was completed in 2014, and there are currently no updates to that</p>

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			<p>Strategic Environmental Assessment in progress or planned.</p> <p>Regional Assessments, on the other hand, examine the known and potential effects of existing and future activities in a region. The results of a Regional Assessment that is conducted in accordance with the Regional Studies provisions of CEEA 2012 are considered by the Canadian Environmental Assessment Agency when determining whether a specific designated project within the region requires a project-specific environmental assessment, and if so, in helping define the specific nature and scope of that assessment.</p> <p>This Regional Assessment is therefore intended to help improve the effectiveness and efficiency of the environmental assessment process as it applies to exploratory drilling and associated activities in this region, while at the same time ensuring the highest standards of environmental protection continue to be applied and maintained for future projects.</p>
Nunatsiavut Government	Existing/New Information	Suggests that the Eastern Newfoundland Strategic Environmental Assessment inform the REA to determine the appropriate threshold of exploratory drilling over time rather than the Advance 2030 goal of drilling 100	The Eastern NL Strategic Environmental Assessment completed by the C-NLOPB in 2014 is a key source background document for

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		<p>exploratory wells by 2030 which seems to be a politically-determined number.</p>	<p>the current Regional Assessment.</p> <p>The Advance 2030 wording in a Whereas clause in the Agreement is a re-statement of the Government of Newfoundland and Labrador's plan to encourage the drilling of up to 100 new exploratory wells by 2030 (as part of the Government's Advance 2030 Plan). These exploratory wells could be anywhere in the Canada-Newfoundland and Labrador Offshore Area, not confined to the Study Area for this Regional Assessment.</p> <p>Since this clause has caused confusion it was changed in the Agreement.</p>
<p>Nutashkuan Innu First Nation</p>	<p>Existing/New Information</p>	<p>Need to incorporate new scientific data and determine the threshold for drilling</p>	<p>The Regional Assessment will involve identifying, reviewing and incorporating all applicable and available information and knowledge sources. This will include relevant scientific data and Indigenous or local knowledge regarding the environmental setting of the region and about the potential environmental effects of exploratory drilling and associated activities, which will help inform the analysis and eventual assessment outcomes and recommendations.</p>

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Oceans North	Existing/New Information Strategic Environmental Assessment	Relationship between the Strategic Environmental Assessment and REA - how they intersect in terms of expected timelines and content.	<p>The C-NLOPB completes Strategic Environmental Assessments for defined parts of the Canada-NL Offshore Area, the results of which are considered by the Board in determining whether further exploration rights (licences) should be offered in whole or in part within the Strategic Environmental Assessment Study Area in question. The Strategic Environmental Assessment for the Eastern Newfoundland Offshore Area was completed in 2014, and there are currently no updates to that Strategic Environmental Assessment in progress or planned.</p> <p>Regional Assessments, on the other hand, examine the known and potential effects of existing and future activities in a region. The results of a Regional Assessment that is conducted in accordance with the Regional Studies provisions of CEAA 2012 are considered by the Canadian Environmental Assessment Agency when determining whether a specific designated project within the region requires a project-specific environmental assessment, and if so, in helping define the specific nature and scope of that assessment.</p> <p>This Regional Assessment is therefore intended</p>

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			<p>to help improve the effectiveness and efficiency of the environmental assessment process as it applies to exploratory drilling and associated activities in this region, while at the same time ensuring the highest standards of environmental protection continue to be applied and maintained for future projects.</p> <p>The rationale for and planned use of the Regional Assessment, and its relationship to the referenced Strategic Environmental Assessment, will be described in the eventual Regional Assessment report.</p>
Oceans North	Factors	<p>Recommend that additions be made in factors to include recent announcements of fisheries closures, areas identified as sensitive benthic areas, recommendations of the Marine Protected Area Standards Panel, and any closures within the NAFO regulatory area for the purposes of biodiversity conservation.</p> <p>Specific reference to Aichi Target 11 should be made as well as international standards for MPAs and other effective conservation measures.</p>	<p>No change – kept same to be consistent with new proposed legislation language in Bill C-69. However, these things would be taken into account in the effects assessment as well as in 1(h) the extent to which the effects of offshore exploration drilling hinder or contribute to the Government of Canada’s ability to meet its environmental obligations.</p>
Newfoundland & Labrador Oil & Gas Industries	Factors	<p>Section 1 (d) refers to the ‘purpose of and need for offshore exploratory drilling’ to be considered. Newfoundland & Labrador Oil & Gas Industries Association feels this is a broad statement and further</p>	<p>No change – kept same to be consistent with new proposed legislation language in Bill C-69.</p>

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Association		clarity must be provided on how this will impact the Regional Assessment.	
Mekap'sk Mi'kmaq Band	Factors	Requests Appendix C, Factors to be considered include an assessment of “any cumulative effects that are likely to result from offshore drilling in combination with other physical activities that have been or will be carried out” should be amended to include cumulative effects that likely to result from offshore drilling in combination with the effects of changes to weather conditions and climate, including effects on water quality, fish and fish habitat, waterfowl, benthic flora and fauna and marine sediment quality.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.
Newfoundland & Labrador Oil & Gas Industries Association	Factors	Newfoundland & Labrador Oil & Gas Industries Association is pleased to see inclusion of socioeconomic factors given social and economic impacts of industry for the province.	Noted.
Husky Energy	Factors	Requirements related to the Government of Canada's commitment to climate change and the effect on intersection of sex and gender with other identity factors need clarification.	The Regional Assessment will include an analysis of how the potential effects of offshore exploration hinder or contribute to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change. For example, the Regional Assessment will include an analysis of greenhouse gas emissions as a result of

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			<p>exploratory drilling projects and identify appropriate mitigation measures and follow-up requirements.</p> <p>The Government of Canada is currently developing a Strategic Assessment of Climate Change. The assessment, once completed, will provide guidance to proponents, stakeholders, Indigenous Peoples and decision makers on how climate change commitments should be considered in impact assessments and how the project's contribution to climate change would be assessed.</p> <p>The Regional Assessment will reflect, as appropriate, the recommendations from the Strategic Assessment of Climate Change, should these be available within the timeline of the Regional Assessment.</p> <p>The Regional Assessment will also consider other environmental obligations of Canada, such as species at risk, and marine conservation targets.</p> <p>The Regional Assessment will build upon and consider the existing information and analyses from associated regulatory processes and other existing measures that are in place to address any identified sex and gender-based issues</p>

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			<p>relevant to the activity of offshore exploratory drilling.</p> <p>For example, the Canada-Newfoundland and Labrador Offshore Petroleum Board currently requires that operators develop and provide Benefits Plans and associated Diversity Plans as part of their approvals processes for offshore exploratory drilling. As part of these plans, operators must report regularly on project employment by gender (male/female) and by designated groups (women, Indigenous Peoples, visible minorities, persons with disabilities). Operators must include provisions in a Benefits Plan to ensure that disadvantaged individuals or groups have access to training and employment opportunities, and to enable their participation in the supply of goods and services. Operators are also expected to review, assess and apply models such as the federal <i>Employment Equity Act</i> and the Federal Contractors Program in preparing their Diversity Plans. The Regional Assessment will review the content of previous Diversity Plans and reporting, where available, and evaluate their applicability and outcomes.</p>
Miawpukek First	Factors	Requests to replace “Negative consequences” with	No change – kept same to be consistent with

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Nation		"adverse effects" in Appendix C section 1 of the Draft Agreement, in accordance with legislation and policy related to CEAA 2012.	new proposed legislation language in Bill C-69.
Miawpukek First Nation	Factors	Suggest revising wording in Appendix C section 1 (j) to include "the requirements of the follow-up program in respect of offshore exploratory drilling, including opportunities for Indigenous peoples or governing bodies to lead or participate directly in follow-up activities." Notes, currently there is no consideration of how Miawpukek First Nation and other indigenous peoples may be involved in Regional Assessment follow-up, in the Draft Agreement.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.
Mekap'sk Mi'kmaq Band	Factors	Requests Appendix C, Factors to be considered include an assessment of potential local employment and business opportunities resulting from offshore oil and gas exploration activity.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.
Canadian Association of Petroleum Producers	Factors	Should be considered to be equivalent to the new Act.	The scope of the factors is reflective of the language in the proposed legislation in order for the Regional Assessment to remain applicable should new legislation come into force.
Mekap'sk Mi'kmaq Band	Factors	Requests Appendix C, Factors to be considered include possible exploration scenarios, inclusive of activities, equipment and infrastructure, financial and human resources, and potential accidents and malfunctions.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.

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Mekap'sk Mi'kmaq Band	Factors	Requests Appendix C, Factors to be considered include an assessment of effects and changes likely to be caused by offshore exploratory drilling should be amended to assess impacts and effects on each of a local (project footprint), regional and transboundary level.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.
Mekap'sk Mi'kmaq Band	Factors	Requests Appendix C, Factors to be considered include an assessment of both direct and indirect impacts to commercial fisheries resulting from offshore oil and gas exploration.	No change – kept same to be consistent with new proposed legislation language. However, this would fall under the changes to the environment or to health, social or economic conditions and the positive and negative consequence of these changes that are likely to be caused by offshore exploratory drilling.
Qalipu First Nation	Factors	The Regional Assessment framework consider ecosystem health and how it may be impacted by offshore oil exploration and related activities in addition to specific culturally/traditionally important species.	<p>The Regional Assessment will consider all potential impacts identified during the Regional Assessment process, by offshore oil and gas drilling exploration and associated activities.</p> <p>The Regional Assessment will take an “ecosystem approach” to the analysis, fully recognizing the importance and interrelationships of its various biophysical and socioeconomic components, as well as the dynamic nature of such systems and their responses to disturbance.</p>
Wolastoqey	Factors	RE: Appendix C: In the Regional Assessment, Regulators	No change – kept same to be consistent with

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Nation NB		should be more concerned about the proponent maintaining a minimum environmental standard and mitigations associated with environmental projection, rather than whether offshore drilling is economically and/or technically feasible, and the purpose and need for offshore drilling.	new proposed legislation language in Bill C-69.
Wolastoqey Nation NB	Factors	RE: Section 1(c) Appendix C: The Regional Assessment should also consider how to avoid adverse environmental effects and adverse impacts to section 35 rights.	No change – kept same to be consistent with new proposed legislation language in Bill C-69.
Woodstock	Factors	Need for more detail on the criteria for considering recovery of a population or ecological component to an impact. Requests the draft Agreement describe the criteria or approach to collecting sufficient information used by the Committee in considering the time required for a population or ecological component to recover from an impact and return to pre-impact conditions. How will the criteria or approach change if the population or ecological component is data deficient? Also, in TOR subsection 2.0, include a statement requiring that the Committee also take into account how the results from the Regional Assessment compare against known ecological thresholds, or thresholds that are meaningful to the traditional land users.	The Regional Assessment will assess and evaluate the potential environmental effects of exploratory drilling and associated activities, and in doing do, will consider various related factors - including the likely timing and duration of the disturbances or emissions that result in such effects, as well as the time required for an affected environmental component to recover from such disturbance (eg., eventual benthic recolonization of a drill cuttings pile on the seabed). These assessments will be informed by available scientific information, such as previous studies (including follow-up programs) that provide insights into the nature and degree of such effects, including durations and potential recovery times and any known environmental thresholds. In any cases where

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			<p>there is relatively limited information available on existing conditions or likely effects, this will be recognized and noted in the assessment and may, for example, factor into the results and recommendations that result from the Regional Assessment.</p>
<p>Kwilmu'kw Maw-klusuaqn Negotiation Office</p>	<p>Factors</p>	<p>Page 8, clause 2.1: should include potential impacts to Indigenous rights as defined under s.35 of Constitution Act</p>	<p>On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>.</p>
<p>Mekap'sk Mi'kmaq Band</p>	<p>Factors</p>	<p>Requests Appendix C, Factors to be considered include a description of the existing conditions of the physical, biological and human environments including a discussion of climate change, seasonal conditions, current modelling, sub-sea methane and permafrost, species of cultural interest, species conservation, socio-economic conditions, and the socio-economic significance of the Regional Assessment Study Area to the public and Indigenous groups.</p>	<p>No change – kept same to be consistent with new proposed legislation language in Bill C-69.</p>

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Woodstock	Factors	Committee consider the effectiveness of mitigation measures in the Regional Assessment. Requests that the draft Agreement, under Section 1b, in Appendix C, the Regional Assessment also take into account “mitigation measures that are technically and economically feasible and have scientifically based results indicating the effectiveness of the measures at mitigating adverse effects of offshore exploratory drilling.”	The Regional Assessment will identify and consider feasible mitigation measures to avoid or reduce the potential environmental effects of exploratory drilling and associated activities. As suggested, this will also include consideration of the known or likely effectiveness of such mitigation, both in evaluating any standard measures that are typically applied to such activities, and in considering whether additional or revised mitigations may be prudent in certain instances.
Mekap'sk Mi'kmaq Band	Fishing - Commercial	Concerned about the impact on the Mekap'sk Mi'kmaq Band commercial fishing licenses in Northwest Atlantic Fisheries Management Divisions that overlap with existing and anticipated exploratory drilling projects in the eastern Newfoundland and Labrador offshore, and fall within the proposed Regional Assessment Study Area.	Noted. Your concern will be provided to the Committee, once appointed.
Canadian Parks and Wilderness Society	General	We lack the capacity to respond with comments by the Oct 12 deadline date. We still wish to be engaged in future processes, as we are concerned about the Regional Assessment and offshore exploratory drilling.	Noted. You have been added to the distribution list.
Nutashkuan Innu First Nation	General	Recommendation 7: should clarify international agreements/rules for the Economic Zone (EEZ).	The proposed Regional Assessment Study Area, as defined in the Draft Agreement (Appendix B), includes marine areas that are

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			located both within and beyond Canada's EEZ on the outer continental shelf. The Regional Assessment will fully consider and describe these and other jurisdictional considerations as relevant to the assessment and the various decisions and activities that fall within its scope.
Oceans North	General	Concerned that oil and gas leases are permitted in marine refuges and in areas that have been closed to bottom trawling by the NAFO.	The Government of Canada, through its Ocean Protections Plan, is making change to ensure maximum protections of Canada's marine areas. This includes a commitment to allowing sustainable offshore oil and gas activities take place while meeting marine conservation objectives.
Nutashkuan Innu First Nation	General	Wrong reference to appendixes A, B and D.	Fixed.
Nutashkuan Innu First Nation	General	Questioned the sources and type of information to be used by the Technical Advisory Group for the Regional Assessment.	The Technical Advisory Group members will work in a collaborative manner and use peer-reviewed science, evidence and Indigenous knowledge in the development of the Regional Assessment.
Canadian Association of	Indigenous Knowledge	Indigenous Knowledge is a key aspect that the Regional Assessment needs to address. Indigenous Knowledge	As referenced throughout the Draft Agreement, Indigenous Knowledge that is relevant to the

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Petroleum Producers		studies need to be included that are relevant to offshore activities and include appropriate representation of involved Indigenous groups. Do it once, and do it well.	Regional Assessment and made available through this process will be considered and incorporated into the assessment. Appendix A of the Draft Agreement for example states that the assessment will include consideration of “1(f) Indigenous knowledge provided with respect to offshore exploratory drilling;”, and Section 4.17 states that “The Committee will engage with Indigenous groups and any others that have knowledge relevant to the Regional Assessment or whose interests and uses may be affected by exploratory drilling”, with further such references in Appendix D Section 2.4, Appendix C Section 3.2, and elsewhere.
Equinor Canada Ltd.	Indigenous Knowledge	Equinor Canada Ltd. supports the inclusion and incorporation of Indigenous Knowledge in the Regional Assessment so that standard approaches to address issues can be identified and developed (including proposed mitigation and standard practices).	As referenced throughout the Draft Agreement, Indigenous Knowledge that is relevant to the Regional Assessment and made available through this process will be considered and incorporated into the assessment. Appendix A of the Draft Agreement for example states that the assessment will include consideration of “1(f) Indigenous knowledge with respect to offshore exploratory drilling;”, and Section 4.17 states that “The Committee will engage with Indigenous groups and any others that have knowledge relevant to the Regional

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			Assessment or whose interests and uses may be affected by exploratory drilling”, with further such references in Appendix D Section 2.4, Appendix C Section 3.2, and elsewhere.
Wolastoqey Nation NB	Indigenous Knowledge	"Traditional Knowledge" should be changed to "Indigenous Knowledge" in the draft Agreement so as to be representative of Indigenous knowledge that evolves "over time in response to new circumstances and changes to the environment".	Change made.
Wolastoqey Nation NB	Indigenous Knowledge	Regulators and proponents should respect Indigenous Groups' protocols and agreement should be obtained from Indigenous Groups regarding the collection, use and integration of Indigenous knowledge. Where an Indigenous knowledge study is required, the study should be conducted by Indigenous Groups and funded.	Should an Indigenous Knowledge Study be required for the Regional Assessment, protocols and agreements would be respected with regard to the collection, use and integration of Indigenous Knowledge.
Mi'gmawe'l Tplu'taqnn Incorporated	Indigenous Knowledge	Appendix "A", section 2.4 refers to "traditional knowledge", while Appendix "B", s. 3 refers to "Indigenous knowledge". References should be corrected to "Indigenous Knowledge" throughout.	Change made.
Woodstock First Nation (Woodstock)	Indigenous Knowledge	It is not clear how each of the factors listed in Appendix C Section 1c, including impacts to Treaty rights, will be considered in the decision-making process. Important that the Agency communicate how Indigenous information and input is used or not used in the Regional Assessment.	Change made, see Appendix D, clause 2.2

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		Request that the draft Agreement require follow up reporting to Indigenous communities describing how Indigenous knowledge and recommendations from reviews were used in the Regional Assessment and the rationale why recommendations were not considered in the Regional Assessment.	
Kwilmu'kw Maw-klusuaqn Negotiation Office	Indigenous Knowledge	Page 12 1(f): should include Indigenous cultures, including practices and species of cultural significance	Change made to align with updated wording for proposed legislation in Bill C-69. It is now more broad.
Equinor Canada Ltd.	Indigenous Participation	Equinor Canada Ltd. recommends that the Regional Assessment should be used to develop consultation guidelines so that any new issues that cannot be addressed by standard approaches have a clear and defined process.	The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.
Mi'gmawe'l Tplu'taqnn Incorporated	Indigenous Participation	Clause 4.17 and Appendix "A", section 1.2 of the draft Agreement state that the Committee will engage with "public and Indigenous" groups. This seems to treat Indigenous Groups as stakeholders with interests, and not rights holders with constitutionally protected rights. This contradicts Appendix C, section 1 (c), which states	On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that

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		<p>the Regional Assessment will consider “the impact that exploratory drilling may have on the rights of Indigenous peoples”. If the Regional Assessment is going to consider rights impacts, then the Regional Assessment Committee must consult with Indigenous Groups, and not just engage. Such language should be reflected in the draft Agreement.</p>	<p>offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation.</p>
<p>Kwilmu'kw Maw-klusuaqn Negotiation Office</p>	<p>Indigenous Participation</p>	<p>Re: Clause 4.17: include more than engagements - opportune time to address the identification of gaps during review and submission of written comments.</p>	<p>Indigenous Groups whose interests may be potentially impacted by exploratory offshore oil and gas drilling and associated activities will be engaged.</p> <p>Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p>
<p>Wolastoqey Nation NB</p>	<p>Indigenous Participation</p>	<p>Committee should be required to demonstrate how Indigenous input including Indigenous knowledge was considered and integrated in the Regional Assessment (Regional Assessment) and Report.</p>	<p>Change made, see Appendix A, clause 2.2</p>
<p>Wolastoqey Nation NB</p>	<p>Indigenous Participation</p>	<p>Indigenous Groups should be engaged in the preparation of the Regional Assessment Design, including measures for Indigenous engagement.</p>	<p>Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be</p>

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			<p>posted publicly on the CEEA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation.</p>
Mekap'sk Mi'kmaq Band	Indigenous Participation	Request to be included as an Indigenous group in the Regional Assessment process and be meaningfully engaged as rights holders. Be provided capacity funding from the Agency to facilitate meaningful participation.	Indigenous Groups whose interests may be potentially impacted by exploratory offshore oil and gas drilling and associated activities will be engaged. Funding will be administered by the Agency and made available for participating Indigenous communities, stakeholders and the public in the Regional Assessment process. All comments received from Mekap'sk will be considered during the Regional Assessment.
Woodstock	Indigenous Participation	Lack of a clear outline on how the Committee, Task Team and Technical Advisory Group will engage with Indigenous communities. Request to provide a description in the draft Agreement regarding the development of engagement protocols that would include providing adequate timelines and funding to Indigenous communities for their continued participation in the	Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEEA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee. Changes also made in the agreement to reflect

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		Regional Assessment process.	the role of the Committee and the Crown in relation to consultation.
Ecojustice	Indigenous Participation	<p>The Committee must meaningfully consult, not merely “engage” with, Indigenous groups. The Agreement must specify that the Committee is required to meaningfully consult with Indigenous peoples.</p> <p>All references in the Agreement to Indigenous engagement must be replaced by requirements that the Committee consult with Indigenous peoples.</p> <p>The Agreement must state clearly how the Committee’s findings will be used going forward, and must provide an appropriate process to determine how those uses will impact on Indigenous rights.</p>	<p>On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation. The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p>
Miawpukek First Nation	Indigenous Participation	Request to identify clearly in Appendix A, section 2.3 or elsewhere in the Draft Agreement that Miawpukek First Nation will be engaged and consulted and have its comments and requests meaningfully considered by the	Indigenous Groups whose interests may be potentially impacted by exploratory offshore oil and gas drilling and associated activities will be engaged.

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		Committee.	
Kwilmu'kw Maw-klusuaqn Negotiation Office	Indigenous Participation	section 6.1: also reference Indigenous Decision Makers and Authorities	Language is reflective of what is found under section 11 of CEEA 2012. Language was included in the agreement to ensure provincial and federal departments provide information to the Committee in a timely manner if requested.
Kwilmu'kw Maw-klusuaqn Negotiation Office	Indigenous Participation	Page 8, clause 1.2: include providing reasonable time for Indigenous groups to review and identify gaps prior to making publicly accessible.	Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEEA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.
Kwilmu'kw Maw-klusuaqn Negotiation Office	Indigenous Participation	Page 11, clause 2.1: must include Indigenous representation and expertise	As the Task Team requires expertise, it will seek out people in those disciplines to provide that expertise. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you

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			<p>have experience or expertise that you think the Committee or Task Team may require please let us know.</p>
<p>Canadian Association of Petroleum Producers</p>	<p>Indigenous participation</p>	<p>Indigenous engagement for a Regional Assessment must be consistent with the level of thoroughness in operator-led EAs and fulfil the Crown's duty to consult. Government should also clearly define the consultation process, timelines and how concerns will be addressed. The consultation phase cannot be a means to delay. Want a more standardized or harmonized approach to engagement.</p>	<p>Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEEA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p> <p>On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the Constitution Act, 1982;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation.</p>
<p>East Coast Environmental</p>	<p>Indigenous participation</p>	<p>The Agreement should clarify that the Regional Committee be required to fully and meaningfully consult with Indigenous Peoples. There is no distinction between</p>	<p>On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be</p>

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Law		<p>public and Indigenous engagement. The obligation to consult Indigenous peoples should be clearly set out in the Agreement. A commitment of meaningful engagement with Indigenous Peoples which aims to secure their free, prior and informed consent should be clearly articulated in the Agreement.</p>	<p>considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation</p>
Equinor Canada Ltd.	Indigenous Participation	<p>Important to ensure Indigenous groups are engaged throughout the Regional Assessment process to ensure that Traditional Knowledge and Traditional Use Studies are accurately reflected in the Regional Assessment.</p>	<p>As referenced throughout the Draft Agreement, Indigenous Knowledge that is relevant to the Regional Assessment and made available through this process will be considered and incorporated into the assessment. Appendix C of the Draft Agreement for example states that the assessment will include consideration of “1(f) Indigenous knowledge provided with respect to offshore exploratory drilling;”, and Section 4.17 states that “The Committee will engage with Indigenous groups and any others that have knowledge relevant to the Regional Assessment or whose interests and uses may be affected by exploratory drilling”, with further such references in Appendix D Section 2.4, Appendix C Section 3.2, and elsewhere.</p>

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Kwilmu'kw Maw-klusuaqn Negotiation Office	Indigenous Participation	Concerned about public (engagement and consultation) vs. indigenous consultation (consultation with Mi'kmaq and Inuit); the Regional Assessment should clearly distinguish between good governance and constitutional duty to consult.	<p>On page 8, clause 2.2 it indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the Constitution Act, 1982;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation</p>
Woodstock	New/Existing Information	Requests that the Regional Assessment consider changes in ecological parameters from historical conditions. Recommends that the Regional Assessment include, a requirement that the Task Team or Technical Advisory Group scientifically quantify regional effects by calculating rates of environmental change from the past to the present and estimating change into the future; and require collaboration with Woodstock and other Indigenous communities in the development of thresholds where an exceedance of this level equates to that resource no longer meeting the needs of future generations of traditional land users.	The description of the existing environmental setting in the Regional Assessment will focus primarily on describing the existing (current, baseline) environmental conditions, based on the availability and age of relevant environmental information and other factors. Although it may not be possible, given the available information and associated analytical capabilities to “scientifically quantify regional effects by calculating rates of environmental change from the past to the present and estimating change into the future”, the assessment will consider whether and how

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			<p>these existing environmental conditions have been affected by, and therefore reflect, past and on-going effects. This will include effects results from natural and anthropogenic disturbances (e.g. climate change, fishing activity, past and on-going oil and gas activity, general marine traffic), where this is possible and feasible based on the available information.</p>
Ecojustice	Next Draft of Agreement	<p>If revisions are proposed to the draft Agreement as a result of our/other comments, a draft should be provided for further public review/comment prior to being finalized.</p>	<p>The Final agreement will be posted to the online registry as well as a summary of the comments along with how they were considered.</p>
Canadian Association of Petroleum Producers	Outcome of Report	<p>Want a clear outcome for the report – appendix A sec 2.2 and 2.3.</p> <p>Want the types of projects that will be either:</p> <p>(a) identified on the designated project list regulation and completely excluded from further project assessment providing or</p> <p>(b) identified on the designated project list regulation and will require reduced project assessment. And for those described as (b) they want the factors described that will be omitted in future reduced project assessments.</p>	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of

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			<p>environmental effects;</p> <ul style="list-style-type: none"> • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
East Coast Environmental Law	Participant Funding	Should include a statement that participant funding will be made available	Agreement has been updated to indicate that participant funding will be made available.
Ecojustice	Participant Funding	The Agreement must specify that adequate participant funding will be made available and must establish an appropriate application process for such funding. Funding amounts must be sufficient to ensure robust participation from interested parties. Participant funding costs should be recovered from industry currently holding oil and gas interests in this area.	Agreement has been updated to indicate that participant funding will be made available.
Miawpukek First Nation	Participant Funding	Requests that Miawpukek First Nation be meaningfully funded to participate in the Regional Assessment process and opportunities to gather information and knowledge to allow Miawpukek First Nation to provide meaningful	Miawpukek First Nation will have the opportunity to participate in the Regional Assessment. Funding will be administered by the Agency and made available for participating

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		evidence to the Regional Assessment to ensure potential impacts to its rights and interests are considered and to provide meaningful input on mitigation and accommodation measures.	Indigenous communities, stakeholders and the public in the Regional Assessment process. Any information and comments, including Indigenous Knowledge, submitted by Miawpukek First Nation during the Regional Assessment process will be considered by the Committee/Task Team.
Canadian Association of Petroleum Producers	Participation	Proponents should be active participants as they have relevant subject matter expertise and experience. Want potentially directly and adversely impacted parties distinguished from interested parties. Want engagement to focus on potentially directly and adversely impacted parties only.	The Committee will engage with the public and indigenous groups. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.
Woodstock	Participation	Early engagement is needed to gather sufficient information on factors to be considered in the Regional Assessment. Requests the draft Agreement outline how the engagement process will include input from Woodstock concerning the following: <ul style="list-style-type: none"> • selection of ecological and social/traditional parameters for assessment, • how the significance of environmental and social change will be defined; and, • what the significance thresholds should be and whether 	The Committee will engage with the public and indigenous groups. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee

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		or not the surpassing of thresholds can be mitigated.	
Husky Energy	Participation	Indigenous and stakeholder consultation is critical to the successful completion of a Regional Assessment. Draft Agreement does not reference either the process or scope for consultation, leaving a completion date of Fall 2019 in doubt. The Agreement should set expectations for a consultation plan that is achievable in the allotted time.	The Committee will engage with the public and indigenous groups. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.
Qalipu First Nation	Participation	Requested an improved EA process that enables increased public participation, allowing interested groups to efficiently and effectively participate in the Regional Assessment process.	The Committee will engage with the public and indigenous groups. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.

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East Coast Environmental Law	Participation	<p>The Agreement should clarify that the engagement will include clear opportunities for members of the public to present to the Regional Committee in a manner that is accessible and with adequate time to prepare. Further the Agreement should define 'engagement' as a process of listening and interacting with the goal of mutual sharing and learning, thereby improving the process and the result.</p>	<p>As indicated in the terms of reference for the Committee there will clear opportunities for members of the public to be engaged throughout the process. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p>
Ecojustice	Participation	<p>At a minimum, the process should permit oral testimony, with the ability to test information, evidence and opinions by way of cross-examination and/or other forms of questioning, and by presenting rebuttal evidence. Written summations should also be permitted once the evidence portion closes.</p> <p>Public sessions should be held in a number of locations in Newfoundland and Labrador to allow the public to fully access this process.</p>	<p>This is a Committee for a Regional Assessment, not a panel process. The Committee will engage with the public and indigenous groups. Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p>
Miawpukek First Nation	Process	<p>RE: Section 5.9: Seeking clarity whether digital, spatially-based system for Regional Assessment will be made available to Indigenous Groups, including Miawpukek First Nation. Request that the Committee consider making the Regional Assessment digital, spatially-based system</p>	<p>As noted in the cited section of the Draft Agreement, the Committee is responsible for providing advice on the feasibility of, and how best to develop and structure, such a system. This will include consideration of and</p>

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		available for use by Indigenous groups including Miawpukek First Nation during and after the Regional Assessment process. An important resource for Miawpukek First Nation's environmental and marine resource stewardship, and for understanding the regional environment.	recommendations around whether and how such a system can and should be made available to Indigenous groups and other parties during and after the completion of the Regional Assessment.
Qalipu First Nation	Process	In support of the draft Agreement and Qalipu First Nation look forward to a framework and improved efficient EA process, while maintaining and increasing environmental protection.	Noted.
Nutashkuan Innu First Nation	Process	Recommend that the current Impact Assessment intentions should be applied.	The Regional Assessment will be designed in such a way that allows it to remain applicable under the proposed Impact Assessment Act, once that Act comes into force.
Miawpukek First Nation	Process	Request to clarify in Appendix C, Factors: Section 1 (b) and (e) and/or sections of the draft Agreement whether 'economic feasibility' applies to multiple projects. If multiple projects, then costs should be shared amongst multiple proponents when considering alternative means of carrying out offshore exploratory drilling. This is particularly relevant for mitigation measures related to emergency response.	The reference to "economically feasible" is meant for a project's mitigations measures and alternative means, not shared amongst multiple proponents.
Elsipogtog First Nation	Process	It is unclear how the proposed regional assessment process will influence and support the existing individual	The Committee will provide its advice on how the results of the Regional Assessment can be

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		<p>environmental assessment processes currently underway for the various oil exploration projects proposed for the Newfoundland offshore area.</p>	<p>used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Elsipogtog First Nation	Process	<p>Recommends that the existing individual EA processes be on hold while Regional Assessment process is underway, so, information collected during Regional Assessment can inform individual EAs.</p>	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related</p>

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			<p>to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
<p>Ecojustice (submission filed on behalf of Sierra Club Canada Foundation,</p>	<p>Purpose</p>	<p>The Agreement must be clear that the objective of the Regional Assessment process is to gather baseline data to inform activity-specific environmental assessments. The Regional Assessment can't be a mechanism to facilitate offshore oil and gas development, or to expedite approvals of exploration activities.</p>	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p>

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Council of Canadians and Ecology Action Centre)			<p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Equinor Canada Ltd.	Purpose	Equinor Canada Ltd.'s primary concern is ensuring the Regional Assessment allows for substitution of individual EAs at the individual EL/wellsite level.	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p>

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			<ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
ExxonMobil	Purpose	ExxonMobil recommends adding a clearly defined purpose and scope to the Agreement to explicitly state that the Regional Assessment is to be a tool used for exclusion or substitution for assessment under the IAA within the Canada-NL offshore region.	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous

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			<p>projects;</p> <ul style="list-style-type: none"> • enable effective management of environmental effects; • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Nunatsiavut Government	Purpose	Request to clarify how the Regional Assessment will improve the efficiency of the EA process as it relates to offshore oil and gas exploration.	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of

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			<p>environmental effects;</p> <ul style="list-style-type: none"> • improve regulatory efficiency and reduce consultation burden on Indigenous groups and stakeholders; and, • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Husky Energy	Purpose	<p>While there is no purpose or objective stated within the Draft Agreement Husky Energy supports the initiative to conduct a Regional Assessment as a basis for exemption of exploration drilling projects from the requirement for impact assessment act.</p> <p>However, we are concerned by the lack of detail in the Draft Agreement.</p>	<p>The Committee will provide its advice on how the results of the Regional Assessment can be used to inform and guide future environmental assessments and regulatory decisions related to proposed offshore exploratory drilling projects within the region.</p> <p>The intent is to develop a regional assessment that will:</p> <ul style="list-style-type: none"> • build upon the experience and knowledge gained in assessing previous projects; • enable effective management of environmental effects; • improve regulatory efficiency and reduce

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			<p>consultation burden on Indigenous groups and stakeholders; and,</p> <ul style="list-style-type: none"> • result in more efficient project reviews for exploration programs with known impacts and proven mitigation measures through the adoption and application of standard information requirements and mitigation measures.
Ecojustice	Record of Process and Report	<p>The Agreement should specify expressly that information provided by the oil and gas industry in this process will be public and, for clarity, that the privilege created by section 119(2) of the Accord Act does not apply to any document submitted in the course of the Regional Assessment.</p> <p>Likewise, the Agreement should state explicitly that section 45(4) of CEAA 2012 (and subsequently section 53(4) of C-69) will not apply to any information supplied by industry (i.e., all information supplied by industry will be available to the public).</p> <p>Disclosure of such industry information (for instance, on measures it can take to mitigate potential environmental effects) must occur within a reasonable time, such that it can be reviewed and assessed once it becomes available.</p> <p>The Committee may create an exception to this general information disclosure requirement for traditional</p>	<p>The C-NLOPB is bound by the privilege provisions of the Accord Acts. Information can only be released to the extent permitted by law as provided in those provisions</p>

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		knowledge provided by Indigenous peoples.	
Oceans North	Record of Process and Report	<p>Support the concept of the public registry for all information related to the REA and in particular the use of a spatial online data base. Should include information on species distributions, endangered species, high concentration of sponges and corals, etc.</p> <p>Recommend that this be used as an example for other EA processes and link into <i>Species At Risk</i> data bases for EAs as well as fisheries data bases so that data quality in EAs is improved overtime and EAs become more efficient through the use of shared databases.</p>	<p>The Regional Assessment will involve the identification, analysis and incorporation of all relevant and available environmental baseline information, with a particular focus on existing regional-scale datasets related to those components of the environment that may be affected by future offshore exploratory drilling and associated activities in the Study Area. As noted in the Draft Agreement, the Committee will also explore, and provide advice on, the development of a digital, spatially-based system to house and use information generated during the Regional Assessment, including the feasibility of, and how best to develop, structure and maintain, such a system. This will include looking at other existing and available data storage and sharing systems and platforms and evaluating their potential utility in housing and updating the geo-spatial information resulting from the Regional Assessment.</p>
East Coast Environmental Law	Record of Process and Report	Should be timely and free. Should clarify that all information received by the Committee will be included in the public registry.	See section 5 Record of Process and Report.

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Kwilmu'kw Maw-klusuaqn Negotiation Office	Report	Page 8, clause 2.2: last bullet should provide for a "detailed" summary of any comments and concerns.	As per clause 2.2, the authors of the Report will summarize and incorporate all comments and concerns raised by Indigenous Groups. There will be an opportunity to review and comment on the draft Report.
Miawpukek First Nation First Nation	Rights Assertion	The rights of Miawpukek First Nation are not listed as a factor in section 4.17 of the draft Agreement. Request to revise wording in section 4.17 to "The Committee will engage with Indigenous groups and any others that have knowledge relevant to the Regional Assessment or whose rights, interests and uses may be affected by exploratory drilling."	There are no individual Indigenous groups listed or defined. All Indigenous Groups will be engaged regarding their 'interests' and whether their 'interests' may be potentially impacted by exploratory drilling throughout the Regional Assessment process.
Mekap'sk Mi'kmaq Band	Rights Assertion	Mekap'sk Mi'kmaq Band assert they hold and exercise rights to fish and harvest wildlife for food, social and ceremonial purposes in areas that would be impacted by any environmental impacts resulting from these existing and anticipated exploratory drilling projects.	The Agency will continue to notify Mekap'sk and seek information on how the exploratory offshore oil and gas drilling may impact Mekap'sk's interests during the Regional Assessment process.
Mekap'sk Mi'kmaq Band	Rights Assertion	Requests the Agency reconsider its determination that the Duty to Consult has not been triggered by the Mekap'sk Mi'kmaq Band's Aboriginal Title assertion.	The Agency will continue to notify Mekap'sk and seek information on how the exploratory offshore oil and gas drilling may impact Mekap'sk's interests during the Regional Assessment process.
Mekap'sk	Rights Assertion	Mekap'sk Mi'kmaq Band notes the draft agreement does	On page 8, clause 2.2 it indicates that the

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Mi'kmaq Band		not include reference to Indigenous groups whose Aboriginal rights may be affected by exploratory drilling. Suggests section 4.17 of the draft agreement be revised to state: "The Committee will meaningfully engage with Indigenous groups and any others that have knowledge relevant to the Regional Assessment or whose rights, interests and uses may be affected by exploratory drilling."	<p>Committee should include in its report all information described in the Factors to be considered (Appendix A). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation</p>
Elsipogtog First Nation	Rights Assertion	Concerned about the potential impacts of numerous oil exploration programs being proposed for this area will have on our Aboriginal title, rights and treaty rights.	<p>On page 8, clause 2.2 indicates that the Committee should include in its report all information described in the Factors to be considered (Appendix C). This includes the impact that exploratory drilling may have on any Indigenous group and any adverse impact that offshore exploratory drilling may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>;</p> <p>Changes also made in the agreement to reflect the role of the Committee and the Crown in relation to consultation.</p>

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Husky Energy	Scope	<p>Must include the geophysical surveys associated with each well. Wellsite surveys are required by the C-NLOPB as a safety measure to identify potential hazards for each exploration well. Vertical seismic profiles (VSP) are commonly used to delineate the specific petroleum resource targeted by each well. Wellsite surveys and VSPs are standard activities assessed as part of every offshore drilling environmental assessment.</p>	<p>The scope of the Regional Assessment is intended to cover exploratory drilling and associated activities, including the various types of activities that are typically included in the scope of recent and on-going EAs for exploratory drilling programs off Eastern Newfoundland under CEAA 2012.</p>
Ecojustice	Scope	<p>The Regional Assessment should consider the extent to which exploratory drilling may be displaced by other activities and uses of the offshore area. In keeping with Canada's commitments to reduce greenhouse gas emissions, and in order to consider alternatives to oil and gas development, the Committee must be clearly tasked with assessing offshore renewable energy development as an alternative scenario in this Regional Assessment.</p>	<p>The Regional Assessment is focused on the activities of exploratory offshore oil and gas drilling, not development.</p> <p>However, Appendix A includes factors to be considered, including "any cumulative effects that are likely to result from offshore exploratory drilling in combination with other physical activities that have been or will be carried out".</p>
Canadian Association of Petroleum Producers	Scope	<p>Scope must be well-defined.</p> <ul style="list-style-type: none"> - Thorough scoping of issues to be considered in the assessment, through meaningful public participation and Indigenous consultation - Consideration of environmental, social, and economic sustainability objectives for the region - Use of sound accepted environmental assessment practices to ensure relevance to the draft <i>Impact</i> 	<p>The scope of the Regional Assessment is intended to cover exploratory drilling and associated activities, including the various types of activities that are typically included in the scope of recent and on-going EAs for exploratory drilling programs off Eastern Newfoundland under CEAA 2012.</p> <p>As noted, it is currently planned that exploratory</p>

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		<p><i>Assessment Act</i></p> <ul style="list-style-type: none"> - Documentation of areas, issues, effects, and mitigations that are well understood and those that are uncertain <p>Want delineation wells considered as part of scope.</p>	<p>drilling and associated activities (including potential delineation drilling) will be included within the scope of the Regional Assessment, where these activities are planned as part of future exploratory drilling programs that are subject to federal EA review and approval, and which have planned characteristics (equipment, methods, emissions, etc.) that are in keeping with those described and considered in the Regional Assessment.</p> <p>The scope of the Regional Assessment, including the types of exploratory activities and the environmental components and potential effects upon which it is focused, will be clearly identified and considered in the planning and completion of the assessment. These factors and their scope will be defined through consideration of relevant legislation and regulations, the eventual Final Agreement for conducting the Regional Assessment, and the various inputs and perspectives provided throughout associated Indigenous, stakeholder and public sessions.</p> <p>The Regional Assessment will likewise be based on sound impact assessment approaches and practices, will consider all</p>

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			<p>relevant information (and any associated uncertainty) pertaining to the existing environment and the assessment of potential effects and associated mitigation, with a view to optimizing the eventual utility of the assessment and its outcomes for future exploratory drilling programs in this region.</p>
Husky Energy	Scope	<p>Recommend delineation drilling be considered within the scope of activities assessed within the Regional Assessment since there is no distinction between activities or potential environmental effects for an exploration well. Inclusion of delineation wells into the Regional Assessment would avoid the duplication of consultation and assessment for subsequent wells, within each exploration license.</p>	<p>The scope of the Regional Assessment is intended to cover exploratory drilling and associated activities, including the various types of activities that are typically included in the scope of recent and on-going EAs for exploratory drilling programs off Eastern Newfoundland under CEEA 2012.</p> <p>As noted, it is currently planned that exploratory drilling and associated activities (including potential delineation drilling) will be included within the scope of the Regional Assessment, where these activities are planned as part of future exploratory drilling programs that are subject to federal EA review and approval, and which have planned characteristics (equipment, methods, emissions, etc.) that are in keeping with those described and considered in the Regional Assessment.</p> <p>The scope of the Regional Assessment,</p>

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			<p>including the types of exploratory activities and the environmental components and potential effects upon which it is focused, will be clearly identified and considered in the planning and completion of the assessment. These factors and their scope will be defined through consideration of relevant legislation and regulations, the eventual Final Agreement for conducting the Regional Assessment, and the various inputs and perspectives provided throughout associated Indigenous, stakeholder and public sessions.</p> <p>The Regional Assessment will likewise be based on sound impact assessment approaches and practices, will consider all relevant information (and any associated uncertainty) pertaining to the existing environment and the assessment of potential effects and associated mitigation, with a view to optimizing the eventual utility of the assessment and its outcomes for future exploratory drilling programs in this region.</p>
Miawpukek First Nation	Scope	Requests the Draft Agreement include effects on Miawpukek First Nation caused by changes to the environment, and refer to section 5.1(c) of CEEA 2012. Notes that Item (c) in Appendix C, section 1 does not	Appendix A includes reference to the changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes that

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		refer to section 5.1(c) of CEAA 2012.	are likely to be caused by offshore exploratory drilling. Effects with respect to aboriginal peoples health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes, etc. would be covered by this clause.
Nutashkuan Innu First Nation	Scope	Will DFO's definition of ecosystem/ecology be adopted – see section 4.1.1 at http://www.dfo-mpo.gc.ca/science/publications/framework-cadre/index-eng.htm .	<p>The Regional Assessment will take an “ecosystem approach” to the analysis, fully recognizing the importance and interrelationships of its various biophysical and socioeconomic components, as well as the dynamic nature of such systems and their responses to disturbance.</p> <p>The cited document and other information sources, including relevant definitions and principles, will be consulted and considered in the planning and completion of the Regional Assessment.</p>
Mekap'sk Mi'kmaq Band	Scope	Requests that Section 4.5 of the draft Agreement include a scope of “existing environmental conditions” and are made available for comment by Indigenous groups prior to the Task Team compiling this information. The scope of existing environmental conditions must include existing traditional sea and land uses of Indigenous groups in the region, and traditional ecological knowledge of the same	In planning and completing the Regional Assessment, the Committee (with support from the Task Team) will engage all interested parties in the identification of existing and available information and knowledge sources for use in the assessment. This input may be provided through an organization's participation

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		<p>Indigenous groups of the offshore and nearshore environment.</p>	<p>in the Task Team itself (which will include representatives from both governmental and non-governmental organizations), or through other engagement mechanisms implemented throughout the Regional Assessment process.</p> <p>As referenced throughout the Draft Agreement, Indigenous Knowledge that is relevant to the Regional Assessment and made available through this process will be considered and incorporated into the assessment.</p>
<p>Nutashkuan Innu First Nation</p>	<p>Scope</p>	<p>Regional Assessment needs to assess diverse ecosystems in the region.</p>	<p>The Regional Assessment will take an “ecosystem approach” to the analysis, fully recognizing the importance and interrelationships of its various biophysical and socioeconomic components, as well as the dynamic nature of such systems and their responses to disturbance.</p> <p>The size and inherent ecological diversity of the Regional Assessment Study Area is recognized and acknowledged. This will be considered throughout the assessment and addressed in for example, the description of the existing environment (including by sub-area where applicable and possible), and in the environmental effects assessment and</p>

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			identification of mitigation.
Nutashkuan Innu First Nation	Scope	Recommendation 4: Regional Assessment should also include potential production/development projects.	<p>The Regional Assessment is focused on the activities of exploratory offshore oil and gas drilling, not development.</p> <p>However, Appendix A includes factors to be considered, including “any cumulative effects that are likely to result from offshore exploratory drilling in combination with other physical activities that have been or will be carried out”.</p>
Mekap’sk Mi’kmaq Band	Scope/Study Area	Concerned about the massive scope of future offshore oil and gas exploration.	Noted.
Nunatsiavut Government	Scope/Study Area	Seeking clarity on the scope and study area of the Regional Assessment, specifically the location of the exploratory drilling which will be assessed (i.e. drilling in Eastern Newfoundland Strategic Environmental Assessment area or all of the offshore of Newfoundland and Labrador as per the Advance 2030 Strategy). There seems to be inconsistency in the draft Agreement.	<p>The wording in the whereas clause in the Agreement refers to the Government of Newfoundland and Labrador’s plan to encourage the drilling of up to 100 new exploratory wells by 2030 (as part of the Government’s Advance 2030 Plan). These exploratory wells could be anywhere in the Canada-Newfoundland and Labrador Offshore Area, not confined to the Study Area for this Regional Assessment.</p> <p>Since it has caused confusion the clause was changed in the Agreement.</p> <p>The first Regional Assessment is being</p>

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			<p>undertaken in the Canada-NL offshore given the level of recent and current activity in the area and the prospectivity (geology/estimated reserve potential). A number of project-specific Environmental Assessments have been completed or are underway in the proposed study area.</p> <p>One of the objectives of the Regional Assessment is to reduce duplication and the burden on all stakeholders including governments, Indigenous groups, industry and the public. It was determined that that selecting this as the study area built upon work that is already underway.</p> <p>Aligning the study area with the governments' scheduled land tenure system for the land sales process also will reduce duplication and will enable a more predictable, effective decision-making process.</p>
Woodstock	Scope/Study Area	<p>Requests data collected for the Regional Assessment database include information on the occurrence, magnitude and extent of accidents and malfunctions from projects previously and currently operating in the area. Request to add to Sub-section 2.4, regional database may also include data on the occurrence, magnitude and extent of accidents, malfunctions and spills for the</p>	<p>The Regional Assessment will include full consideration of both planned components and activities associated with exploratory drilling and associated activities in the Study Area, as well as potential accidental events and their possible environmental effects. This will include review and consideration of past spill events in</p>

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		Regional Assessment area.	the region, as well as summarizing and incorporating the results of oil spill probability analyses and fate and behaviour modelling related to previous and on-going exploratory drilling programs.
Mekap'sk Mi'kmaq Band	Study Area	Appendix D does not include any methodology or justification for the determination of the spatial extent of the proposed Regional Assessment Study Area, or how Indigenous groups were meaningfully engaged in the development of the proposed Regional Assessment Study Area. There is no temporal scope assigned to the Regional Assessment.	<p>The first Regional Assessment is being undertaken in the Canada-NL offshore given the level of recent and current activity in the area and the prospectivity (geology/estimated reserve potential). A number of project-specific Environmental Assessments have been completed or are underway in the proposed study area.</p> <p>One of the objectives of the Regional Assessment is to reduce duplication and the burden on all stakeholders including governments, Indigenous groups, industry and the public. The proposed study area would build upon environmental assessments that are already underway as well as possible future areas of interest for the industry.</p> <p>Aligning the study area with the governments' scheduled land tenure system for the land sales process will reduce duplication and will enable a more predictable, effective decision-making</p>

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			<p>process.</p> <p>Spatially, the proposed Regional Assessment Study Area was provided in the Draft Agreement (Appendix B), for comment by indigenous groups, the public and other stakeholders.</p> <p>Temporally, the Regional Assessment is intended to apply to future exploratory drilling and associated activities within the Study Area, and it is not currently planned that the results of the assessment and its use will have a specific “expiration date”. It is recognized, however, that the Regional Assessment completed in 2019 will be based on information and analysis that will likely change over time, and thus may require updating as required.</p>
Woodstock	Study Area	<p>More detail on how the study boundaries were determined for the Regional Assessment.</p> <p>Recommendations: in the draft Agreement, describe the factors that were used to determine the study area for the Regional Assessment; Was Indigenous input included in the decision-making process on the spatial boundaries for the Regional Assessment area?</p>	<p>The first Regional Assessment is being undertaken in the Canada-NL offshore given the level of recent and current activity in the area and the prospectivity (geology/estimated reserve potential). A number of project-specific Environmental Assessments have been completed or are underway in the proposed study area.</p> <p>One of the objectives of the Regional</p>

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			<p>Assessment is to reduce duplication and the burden on all stakeholders including governments, Indigenous groups, industry and the public. The proposed study area would build upon environmental assessments that are already underway as well as possible future areas of interest for the industry.</p> <p>Aligning the study area with the governments' scheduled land tenure system for the land sales process also will reduce duplication and will enable a more predictable, effective decision-making process.</p> <p>Spatially, the proposed Regional Assessment Study Area was provided in the Draft Agreement (Appendix B), for comment by indigenous groups, the public and other stakeholders.</p> <p>Temporally, the Regional Assessment is intended to apply to future exploratory drilling and associated activities within the Study Area, and it is not currently planned that the results of the assessment and its use will have a specific "expiration date". It is recognized, however, that the Regional Assessment completed in 2019 will be based on information and analysis that will likely change over time, and thus may</p>

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			require updating as required.
Ecojustice	Study Area	The large study area should be sub-divided into multiple sub-areas, with detailed information provided for each area, to ensure sufficiently detailed assessment.	The proposed Regional Assessment Study Area, as defined in the Draft Agreement (Appendix B), has been identified based on various administrative, ecological, and socioeconomic factors that are relevant to the assessment, including the nature and location of future exploratory drilling programs off Eastern Newfoundland that will fall within the scope of the assessment. It is, however, fully anticipated that the descriptions of the existing environment and the associated assessment of potential effects will be framed at the sub-region level, where applicable, but this will also likely vary by environmental component or issue. For example, the discussion of the benthic environment will be structured according to relevant subareas (based on water depth, slope, etc.), whereas other subdivisions may be more relevant for other components such as finfish or fisheries. In the same way, the environmental effects assessment and identification of mitigation may also result in different findings and recommendations for different parts of the Study Area, for different times of the year, etc.

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Ecology Action Centre	Study Area	<p>The Draft Agreement focuses on an extremely large and variable area of ocean, yet the area is not proposed to be subdivided for assessment based on physical, oceanographic or ecological characteristics, or based on current or planned levels of protection. This is a major flaw, particularly because the Regional Assessment Study Area includes a large number of protected areas (<i>Fisheries Act</i> closures) that were established to preserve sensitive, structure forming benthic species (cold-water corals and sponges). Allowing oil and gas exploration within these fishery closures, or other marine protected areas that may be established, directly undermines these protections due to physical damage that occurs during exploration, construction and drilling as well as risks associated with small-scale discharges and large-scale disasters that are a reality for offshore oil and gas development. They want the Committee to explicitly acknowledge the inherent conflict between marine protected areas and oil and gas exploration at the outset of the Regional Assessment process and exclude all related activities from these areas. Also want the Committee to identify areas of particular ecological sensitivity that require designation as protected areas and in which no drilling will be permitted.</p>	<p>The proposed Regional Assessment Study Area, as defined in the Draft Agreement (Appendix B), has been identified based on various administrative, ecological, and socioeconomic factors that are relevant to the assessment, including the nature and location of future exploratory drilling programs off Eastern Newfoundland that will fall within the scope of the assessment. It is, however, fully anticipated that the descriptions of the existing environment and the associated assessment of potential effects will be framed at the sub-region level, where applicable, but this will also likely vary by environmental component or issue. For example, the discussion of the benthic environment will be structured according to relevant subareas (based on water depth, slope, etc.), whereas other subdivisions may be more relevant for other components such as finfish or fisheries. In the same way, the environmental effects assessment and identification of mitigation may also result in different findings and recommendations for different parts of the Study Area, for different times of the years, etc.</p> <p>Finally, it is anticipated that existing and</p>

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			proposed protected and special areas, and potential environmental effects on these resulting from future exploration drilling in the Study Area, will be a key area of focus for the assessment.
Newfoundland & Labrador Oil & Gas Industries Association	Study Area	Appendix A, section 2.1 refers to the 'spatial boundary' and Newfoundland & Labrador Oil & Gas Industries Association feels this boundary map should be further clarified (assumed it is the boundary provided in the Appendix D map but this must be made more clear).	Change made.
Equinor Canada Ltd.	Support for Regional Assessment	Equinor Canada Ltd. has provided references from NGOs/ENGOS that support the intent of Regional Assessments to improve management of cumulative effects, improve decision-making and overall management of offshore oil and gas development. Equinor Canada Ltd. noted the alignment in support of the Regional Assessment by various interest groups.	Noted.
Chevron	Support for Regional Assessment	Chevron supports the intent of the cooperative agreement. Encourage governments to produce a comprehensive assessment of the offshore environment that consolidates existing information, identifies and addresses knowledge gaps, and provides a framework for future exploration activities that assists in streamlining the regulatory	Noted.

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		<p>requirements for those activities.</p> <p>The proposed Regional Assessment is an opportunity to generate a centralized data repository that facilitates future activities and eliminates the need for unnecessary duplicative efforts by proponents while also ensuring that activities continue to be conducted in an environmentally responsible manner.</p> <p>Looks forward to fully participating.</p>	
NSB Energy	Support for Regional Assessment	Expressed support for the Regional Assessment (rather than conducting assessments on a well-by-well basis)	Noted.
Mekap'sk Mi'kmaq Band	Task Team	Task Team should be the joint responsibility of the Ministers and the represented Indigenous governments of the Committee.	The Task Team is made up of public servants from the Agency, the C-NLOPB, NRCan and the Newfoundland and Labrador Department of Natural Resources. As the Task Team requires expertise, it will seek out people in those disciplines to provide that expertise. There is no max cap on the number. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department

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			feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.
Newfoundland & Labrador Oil & Gas Industries Association	Task Team	Given their experience and expertise as the independent regulator, Newfoundland & Labrador Oil & Gas Industries Association insists the C-NLOPB be included throughout all stages of the Regional Assessment process.	C-NLOPB will co-chair the Task Team.
East Coast Environmental Law	Task Team	The Agreement should more clearly define criteria for the members of the Task Team, information on Task Team members should be available to the public and an opportunity to formally raise a concern regarding membership should be available to any member of the public.	The Task Team is made up of public servants from the Agency, the C-NLOPB, NRCan and the Newfoundland and Labrador Department of Natural Resources and is representative of the Parties to the Agreement.
Kwilmu'kw Maw-klusuaqn Negotiation Office	Task Team	Include Indigenous representation on the Task Team	The Task Team is made up of public servants from the Agency, the C-NLOPB, NRCan and the Newfoundland and Labrador Department of Natural Resources. As the Task Team, or Committee once appointed, requires expertise, it will seek out people in those disciplines to provide that expertise. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an

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			<p>as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.</p>
<p>Newfoundland & Labrador Oil & Gas Industries Association</p>	<p>Technical Advisory Group</p>	<p>Membership of Technical Advisory Group and Task Team should be made public.</p>	<p>As the Task Team, or Committee once appointed, requires expertise, it will seek out people in those disciplines to provide that expertise. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person, group or department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.</p>

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Canadian Association of Petroleum Producers	Technical Advisory Group	<p>Clearly defined roles and responsibilities of the lifecycle regulator, governments and agencies</p> <p>Wants the Technical Advisory Group to have a defined scope of technical expertise required. Want them appointed by the Task Team and a cap on number. Want Technical Advisory Group to have industry representation. Does not want the Technical Advisory Group to consider ongoing follow-up etc. want that done by Task Team.</p>	<p>As the Task Team requires expertise, it will seek out people in those disciplines to provide that expertise. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public, along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.</p>
East Coast Environmental Law	Technical Advisory Group	<p>The appointment process and rationale for appointments to the Technical Advisory Group should be open and transparent. Like the Regional Committee the membership of this Group must reflect the breadth of considerations necessary to ensure a balanced, fair and effective process. Undoubtedly the Technical Advisory Group will include experts in oil and gas exploration and development, however, it must also include those who can contribute community and traditional knowledge, experts in marine science, climate science, and the social</p>	<p>As the Task Team requires expertise, it will seek out people in those disciplines to provide that expertise. There is no limit on how many members the Technical Advisory Group may have. The Technical Advisory Group will be fluid in that there is no solid body or membership but rather experts pulled in on an as required basis. Information provided by any person/group/department as part of the Technical Advisory Group will be made public,</p>

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		sciences.	along with the names of those providing that expertise or information. Should you or any other group, person or department feel that you have experience or expertise that you think the Committee or Task Team may require please let us know.
Canadian Association of Petroleum Producers	Timelines	Regional Assessment must have predictable timeline	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.
Canadian Association of Petroleum Producers	Timelines	<p>Timelines for the various phases of the Regional Assessment including:</p> <ul style="list-style-type: none"> - Public consultation - Indigenous engagement - Process for addressing comments - Completion of the Regional Assessment - Submission of the Regional Assessment report to the federal and provincial Ministers - Decision by the Ministers <p>Want opportunities to stop the clock limited to very specific circumstances – decision to extend timelines must be made at the Ministerial level.</p>	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.

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East Coast Environmental Law	Timelines	Submission of a Report by the Fall of 2019 is not a reasonable time-frame. The Agreement should allow the Regional Committee a minimum of 18 months to submit their Report. The timeline should not begin until the Regional Committee members have been appointed and the appointments have been made public. Need a robust process – not fast-tracked.	The Regional Assessment will build on expertise and information gathered in project-specific Environmental Assessments in the selected study area, as well as a number of existing information collected through other measures such as Strategic Environmental Assessments, EEM programs, etc.
Newfoundland & Labrador Oil & Gas Industries Association	Timelines	Newfoundland & Labrador Oil & Gas Industries Association recommends that timelines must be set for all phases of the Regional Assessment including timelines for public and Indigenous consultation, completion and submission of the Regional Assessment itself, and review by the Ministers.	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.
Husky Energy	Timelines	<p>Completion of the Regional Assessment by Fall 2019 is crucial to avoiding multiple, simultaneous review panel assessments for exploration drilling, should the Impact Assessment Act come into force by then, as it is currently drafted.</p> <p>To realize this deadline, there must be clear expectations set amongst all stakeholders and rights holders.</p>	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019. The Agreement including Terms of Reference articulate the roles and responsibilities of the Parties, the Committee, the Task Team and the Technical Advisory Group. Stakeholders will also be expected to adhere to the timelines for activities in support

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			of a completed Regional Assessment.
Nutashkuan Innu First Nation	Timelines	What happens if CEAA 2012 is modified before the Regional Assessment? This Regional Assessment should consider the proposed changes (Bill C-69) and not the current CEAA 2012.	The scope of the factors is reflective of the language in the proposed legislation in order for the Regional Assessment to remain applicable should new legislation come into force.
Nutashkuan Innu First Nation	Timelines	One- year timeline seems too short.	<p>The Regional Assessment will build on expertise and information gathered in project-specific Environmental Assessments in the selected study area, as well as a number of existing information collected through other measures such as Strategic Environmental Assessments, EEM programs, etc.</p> <p>There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.</p>
Newfoundland & Labrador Oil & Gas Industries Association	Timelines	Supportive of Fall 2019 timeline for completion of final Regional Assessment report and transparency in reporting on the Regional Assessment overall.	Noted.
Newfoundland & Labrador Oil & Gas	Timelines	Timelines should be established for periods of consultation. Further, consultation should only occur with groups where scientific evidence demonstrates the	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of

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Industries Association		likelihood of them being directly impacted by exploration drilling programs.	eastern NL is aiming for completion Fall 2019.
Ecojustice	Timelines	<p>We propose that the process be conducted such that Ministers receive the final report by Spring 2021.</p> <p>The draft Agreement doesn't establish any timeframes for consulting with Indigenous groups and others with knowledge relevant to the Regional Assessment. Likewise, the draft Agreement fails to establish timeframes for public participation in the Regional Assessment or for public comment periods.</p>	<p>There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.</p> <p>The Regional Assessment report will build upon expertise and information gathered in project-specific Environmental Assessments in the selected study area, as well as a number of existing information collected through other measures such as Strategic Environmental Assessments, EEM programs, etc.</p> <p>Plans are being drafted to articulate opportunities for engagement as well as the timing of those activities. These plans will be posted publicly on the CEAA Registry following finalization of the Regional Assessment Agreement and appointment of the Committee.</p>
East Coast Environmental Law	Timelines	Want process to be set aside until the new bill is passed and the regulatory framework is in place.	<p>There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.</p> <p>The Regional Assessment will be designed in</p>

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			such a way that allows it to remain applicable under the proposed Impact Assessment Act, once that Act comes into force.
ExxonMobil	Timelines	ExxonMobil recommends that opportunities to stop the clock should be eliminated or at least limited to very specific and restricted circumstances that should be clearly outlined in the draft Agreement.	There is no regulatory timeline for a regional assessment. The Regional Assessment for offshore oil and gas exploration off the coast of eastern NL is aiming for completion Fall 2019.
Canadian Association of Petroleum Producers	Updating the Regional Assessment	Provisions for updates must be included in the ToR	See Amending the Agreement section 8.1