



April 21, 2020

**VIAEMAIL:** [CEAA.BHPCanada.ACEE@canada.ca](mailto:CEAA.BHPCanada.ACEE@canada.ca)

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

Dear Sir/Madam,

**Re: Technical Review & Assessment of the Summary of the Environmental Impact Statement for the BHP Canada Exploration Drilling Project**

On behalf of Mi'gmawé'l Tplu'taqnn, we are responding to the Environmental Impact Statement for the above project, dated March 2020.

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

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

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



All of which is respectfully submitted.

Yours in Peace and Friendship,

<Original signed by>

Marcy Cloud  
Impact Assessment Coordinator  
Mi'gmawé'l Tplu'taqnn Inc.

Cc:

Mike Atkinson, CEAA via email [mike.atkinson@ceaa-acee.gc.ca](mailto:mike.atkinson@ceaa-acee.gc.ca)  
Cheryl Benjamin, CEAA via email [Cheryl.Benjamin@ceaa-acee.gc.ca](mailto:Cheryl.Benjamin@ceaa-acee.gc.ca)  
Robin Boychuk, CEAA via email [robin.boychuk@canada.ca](mailto:robin.boychuk@canada.ca)  
Elizabeth Young, CNLOPB via email [EYoung@cnlopb.ca](mailto:EYoung@cnlopb.ca)