



Kwilmu'kw Maw-klusuaqn Negotiation Office
Mi'kmaq Rights Initiative

Our Rights. Our Future.

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Robin Boychuk
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Re: Review of The Equinor Canada Ltd Central Ridge Exploration Drilling Project Environmental Impact Statement

Ms. Boychuk,

KMKNO has reviewed the Draft Environmental Impact Statement for Central Ridge Exploration Drilling Project. I wish to provide you with our comments, concerns and recommendations. KMKNO has asked UINR to conduct a review of the draft EIS and we have submitted the UINR review to the Impact Assessment Agency of Canada (IAAC).

The Mi'kmaq are the holders of constitutionally protected Aboriginal and Treaty rights, which include the Aboriginal right to fish for food and the Treaty right to fish for a moderate livelihood. Any impacts to fish and fish habitat are impacts to Mi'kmaq rights. Therefore, it is our expectation that the Proponent and regulators will take mitigative measures to reduce potential adverse impacts to Mi'kmaq rights, practice the precautionary principle to address scientific unknowns, and compensate the Mi'kmaq for any infringement on fishing rights.

We wish to reiterate our concern that this exploration project, as well as the other concurrent offshore oil and gas developments in Newfoundland, may impact both Atlantic salmon and American eel. The timing and design of the project activities will be important to reduce potential impact to migrating fish as well as those overwintering. As the UINR review states, the Mi'kmaw culture is dependent on the relationship of the Mi'kmaq to many species, such as Atlantic salmon and the American eel, where the availability of such species is tied to the Mi'kmaq identity.

As detailed within the UINR review, we ask that regulators and the Proponent provide specific additional information to improve clarity, address several cases of misinterpretation of information, address gaps in identified mitigation, expand participation of Indigenous peoples in the co-development of monitoring, and improve mitigation measures based on shared values, incorporation of temporal and adaptive management strategies, and improved coordination with the adjacent oil and gas operations.

Our concerns referred to above are magnified when considering the number of exploration drilling projects being proposed in the offshore Newfoundland. This intensified development in the offshore makes it even more important that a two-eyed seeing perspective be adopted in a way that values Mi'kmaw relationships to

culturally significant species, prevents harm and waste, protects habitats, embraces the precautionary principle, acknowledges the inherent values within Western science, and considers the power dynamics that limit the participation and guidance of the Mi'kmaq in managing offshore development.

We look forward to further consultation on this matter.

Yours in recognition of Mi'kmaq Rights and Title,

<Original signed by>

Twila Gaudet, BA, LL.B.
Director of Consultation

cc:

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