

Photo by Angelina McDonald

Tilt Cove Offshore Exploration Project

Review and Comments on the Environmental Impact Statement

Prepared by Miawpukek First Nation June 14, 2023



TABLE OF CONTENTS

1.0	Introduction	3
2.0	Miawpukek First Nation	5
2.1	Historic Overview	
2.2	Rights and Interests	7
3.0	Review Findings	8
4.0	Conclusion	12
5.0	References	13

1.0 INTRODUCTION

Suncor Energy Inc. (Suncor or the Proponent) is seeking an approval for the Tilt Cove Exploration Drilling Project (the Project) from the Impact Assessment Agency of Canada (IAAC) and the Government of Newfoundland and Labrador.

Suncor is proposing to conduct an exploration drilling project within an offshore exploration licence in the Jeanne d'Arc Basin, located approximately 300 kilometres southeast of St. John's, Newfoundland (see Figure 1). As proposed, the Tilt Cove Exploration Drilling Project would allow the proponent, over a nine-year period, to determine the presence, nature, and quantities of the potential hydrocarbon resource in exploration licence 1161.

Suncor plans to drill 12 to 16 wells in EL 1161 region, which covers 142,448 net hectares (576.5 km²). The specific well sites are not yet known, but drilling will take place within the boundaries of EL 1161. Areas with the best potential for hydrocarbon reservoirs will be selected. Exploration drilling will be carried out in phases, depending on the results of the initial wells and the availability of rigs.

Because the water depth in EL 1161 is relatively shallow compared to other offshore drilling areas, Suncor will use a semi-submersible rig, also known as a mobile offshore drilling unit (MODU), to complete the exploration drilling for this Project the well design and location for the proposed wells have not yet been finalized.

Suncor has prepared the Environmental Impact Statement (EIS) for Tilt Cove Exploration Drilling Project. Miawpukek First Nation (MFN) has reviewed the EIS report. Comments on this document and the environmental assessment (EA) process in general, are provided in this report. These comments build on previous communications from MFN sent to proponents and the Crown related to offshore exploration.

The rights, values, and interests of MFN are the focus of these comments, and on this basis we concentrate on key issues of commercial and Aboriginal fisheries, species at risk, Atlantic salmon, the marine environment, socioeconomics and community well-being. This report summarizes the position of MFN regarding the Project and outlines, on behalf of our community, recommendations and requested accommodations.

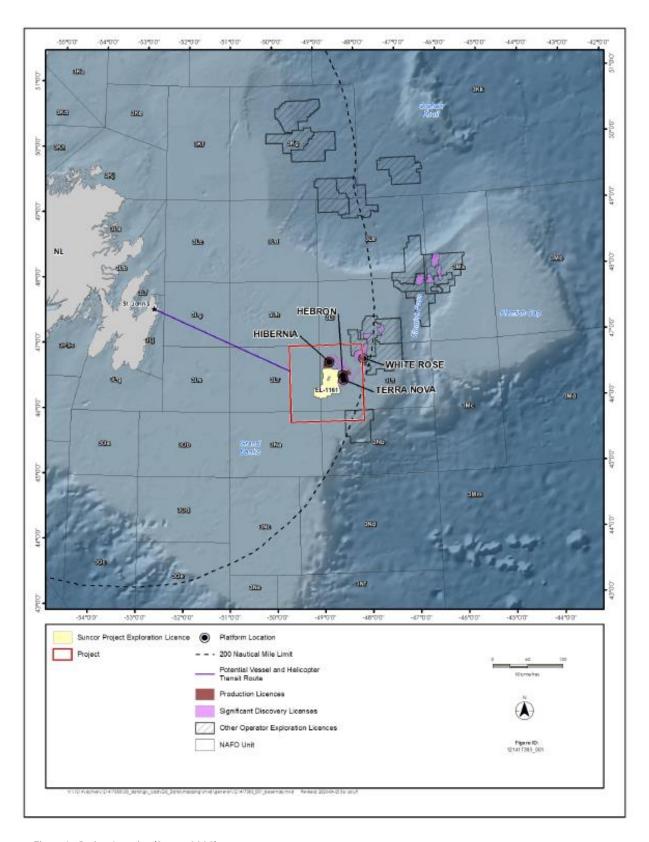


Figure 1 - Project Location (Suncor 2023)

2.0 MIAWPUKEK FIRST NATION

Miawpukek Mi'kamawey Mawi'omi (also known as Miawpukek First Nation) is located on the south shore of Newfoundland along the Conne River at the confluence of the Bay D'Espoir. The community became a permanent settlement in the 1820s but was used long before that as one of the many semi-permanent seasonal camping grounds of the Mi'kmaq on the south shore of Newfoundland. Oral Tradition states that the community reserve lands were established in 1870. This reserve was given the name Samiajij Miawpukek Indian Reserve, which translates to "too small" reserve because the land is considered much too small to carry out traditional activities including hunting for caribou. This name was reportedly chosen partly in frustration and partly out of a sense of humour by the people of MFN.

The total on-reserve population of MFN was recorded as 956 in 2016 (Stats Canada, 2016). In 1987, the community of MFN was established as a reserve, and since that time has changed from an isolated community with almost 90% unemployment to a vibrant community with nearly 100% full or part-time employment.

2.1 HISTORIC OVERVIEW

Covering a vast area, the Mi'kmaq territory of Mi'kmaki stretches from the Gaspe Peninsula in Quebec, through New Brunswick to northern Maine, across Nova Scotia, Prince Edward Island and the Island of Newfoundland, which is known as Ktaqamkuk. The Mi'kmaq of Newfoundland have a shared ancestry with Mi'kmaq from across Mi'kmaki. Their relationship with the land, and the surrounding waters, stretches back over at least 10,000 years.

The earliest use of Ktaqamkuk by the Mi'kmaq is something that is still debated by Western scholars. It is known that Mi'kmaq hunters and fisherman would stay seasonally on the island from as early as the 1600s, although it is likely that this occurred much earlier (Pastore, 1998). French and English historical records suggest that the Mi'kmaq didn't establish permanent residences on Ktaqamkuk until the 1760s (Bartels and Janzen, 1990). However, the idea of permanent residence is rooted in the colonialist ideas and perceptions of the time. It does not account for the Mi'kmaq way of life, which at that time was seasonal and revolved around frequent travel throughout traditional territories to access resources. This would have included travel between Unamaki (Cape Breton) and Taqamkik for hundreds of years before the land became known as Canada. Thus, it is argued by many scholars that the island of Ktaqamkuk is part of the Traditional Territory of the Mi'kmaq.

The people of Miawpukek First Nation assert that the entire Island of Ktaqamkuk is included in their Traditional Territory. Oral history passed down through generations holds that the ancestors of Miawpukek First Nation have lived and travelled Ktaqamkuk since time immemorial. The Mi'kmaq hunted, fished and travelled back and forth along the coasts year-round. Mi'kmaq from the mainland travelled back and forth

between Unamaki and Ktaqamkuk, thus maintaining constant connections between the island and the mainland. This occurred as recently as the 1760s when Chief Jeannot Pequidalouet led a group of Mi'kmaq across the Cabot Straight to avoid hostility and mistreatment at the hands of the British (Martijn, 1989). It should be noted that the Mi'kmaq have a long history as explorers, and similar trips likely occurred frequently before this time but were not documented by European colonizers. This history is best summarized by Frank Speck (1922) who completed ethnographic surveys on Newfoundland in the summer of 1914:

Throughout Newfoundland the [Mi'kmaq] Indians refer to their predecessors as Sa'qawedjkik 'the ancients,' speaking of them as though they were the first inhabitants of the island [...]. The Sa'qawedjkik families are said to have become completely merged with the later [Mi'kmaq] comers from Cape Breton and Labrador. (Speck, 1922, p. 123)

The Mi'kmaq of Ktaqamkuk/Newfoundland have continued to live, hunt, fish, trap and guide on the island over the centuries. During the later part of the 18th century through the 19th century, Mi'kmaq guides helped European explorers to visit and map the areas that were already being used by the Mi'kmaq. In 1822, William Cormack, the first European credited with crossing the island, was guided by Sylvester Joe, a Mi'kmaq traveller. During their journey, the two encountered several First Nations people in areas that were thought, by Europeans, to be uninhabited (Pastore, 1998). Ironically, to earn a wage and support themselves, the Mi'kmaq would go on to work on major projects such as the railroad, which ultimately facilitated the expansion of European colonizers who would fight for control over the natural resources upon which the Mi'kmaq traditional livelihood depended.

Where Newfoundland was not part of Confederation until 1949, the Mi'kmaq of Miawpukek were not included under the Indian Act of 1876. In many ways, this may have been beneficial because they were not subject to the harmful actions exerted by the federal government through this act. However, by being outside of the Indian Act they were also not afforded to the same Aboriginal rights granted to Indigenous Peoples across Canada. This lack of protection, combined with political, economic and religious pressure, led to the continuous erosion of traditional practices and ways of life.

In 1984, after years of fighting for recognition, the federal government granted status to the people of Miawpukek under the Indian Act. This was followed three years later by the allocation of a 500-hectare reserve in Conne River named by Council as the Samiajij Miawpukek Indian Reserve, which translates closely to "too small Indian Reserve." The larger Traditional Territory, known as Mimaju'nnulkwe'kati, covers an area greater than 17,000km² and has never been surrendered or ceded. This area has been used by the members and ancestors of Miawpukek First Nation since time immemorial. Despite repeated land claims and court battles, this area has never been formally recognized. However, the right has never been extinguished and the people of Miawpukek continue the struggle for recognition to this day.

From their earliest time on Ktaqamkuk, the ancestors of MFN relied on hunting and trapping for sustenance. Diet and preferred location changed with the seasons. Spring and summer were typically spent mostly along the coasts, while the Mi'kmaq returned inland, along rivers and lakes, during fall and winter.

The caribou played a special role for the Mi'kmaq of Ktaqamkuk/Newfoundland, due to their size and abundance. They provided nutritious food but also hide for clothing and construction. However, the expansion of European colonists throughout the eighteenth and nineteenth centuries pushed the Mi'kmaq

further and further away from caribou herds, making it more difficult to rely on them for sustenance. Subsequently, large-scale caribou hunting resulted in catastrophic declines of the island population. This pressure nearly caused the extinction of the herd when it declined from an estimated 40,000 individuals in 1900 to approximately 2,000 in the 1930s (Bergerud, 1969). Adapting to the changing circumstances, the Mi'kmaq of Ktaqamkuk/Newfoundland were forced to shift their diets. While fish was always an important part of the Mi'kmaq diet, reduced access to the caribou caused fish, Atlantic salmon in particular, to become much more important.

2.2 RIGHTS AND INTERESTS

The Crown has a duty to consult and accommodate First Nations pursuant to section 35 of the *Constitution Act, 1982*. This is a legal requirement that has been repeatedly upheld by the Supreme Court of Canada. Moreover, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which has been adopted by Canada, requires that states cooperate in good faith with Indigenous Peoples so that they obtain free, prior and informed consent. According to UNDRIP Section (2) and (3) of Article 32:

- 2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.
- 3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.

The proposed offshore project is within fishing grounds that are part of the Traditional Territory of MFN currently used by community members. There are potential major environmental, cultural, and socioeconomic risks associated with all phases of drilling and production that could impact MFN's rights and interests. The offshore production in the Tilt Cove has the potential to cause direct and indirect impacts from all phases.

MFN fisheries (offshore, inshore, and land-based), traditional activities, and culture could be at risk from any potential spills, leaks, blowouts, or other releases of petroleum, cuttings, lubricant, or other products from the proposed drilling. MFN's rights to navigable waters may also be impacted from increased traffic in the region and in and around St. John's Harbour. These potential risks to the natural environment, navigation, and the community of MFN underscore the need for meaningful and ongoing consultation throughout the Environmental Assessment (EA) process and the need for mitigation and accommodation measures to address these potential impacts to MFN rights and interests.

MFN relies on hunting, fishing, and trapping for commercial, recreational, and Aboriginal fisheries. Species that are targeted include salmon, mackerel, cod, herring, redfish, brook trout, rainbow trout, eel, capelin, smelt, tuna, whelk, scallop, snow crab, lobster, and surf clam. MFN possesses several commercial licenses for fishing in NAFO fishing zones 3P, 3KL, and 3LN. The community utilizes a Food, Social and Ceremonial licence to target species off the south shore in Zone 3P. Commercial fishing by MFN in zones 3KL and 3LN

overlap with the Project. Impacts to any of the species listed above represent potential effects on the Aboriginal rights of MFN.

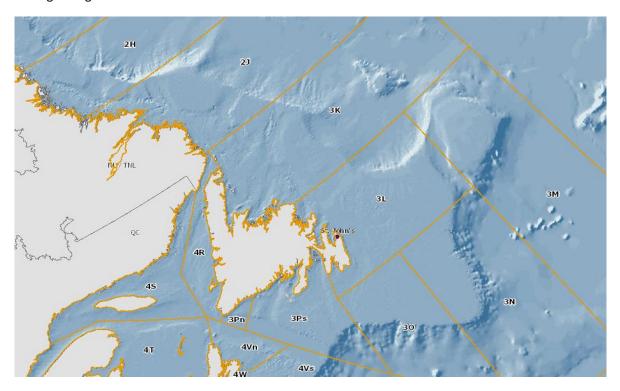


Figure 2. Northwest Atlantic Fisheries Organization (NAFO) Zones (DFO).

3.0 REVIEW FINDINGS

MFN has reviewed the EIS for the Tilt Cove Project and prepared the following comments/recommendations. These draw on comments previously made by MFN for other offshore exploration projects.

Comment 1: The current approach being taken by proponents for the involvement and capacity support of Indigenous communities in EAs for offshore exploration and development projects does not result in meaningful engagement. Throughout the EAs MFN has been inundated with requests for meetings, input, and document reviews. This includes requests for participation during the Impact Assessment process, after approval, and during exploration/production (e.g., EIS documents, communication plans, spill reports, etc.). With very limited staff capacity and funding, MFN is significantly challenged to participate effectively in the process. This situation is worsening as more projects are being proposed or moving forward in the development process, into Significant Discovery Licenses or Production Licenses. The current situation does not in any way represent meaningful consultation by the Crown—which ultimately bears the duty to consult, and where appropriate, accommodate—or by proponents, in discharging procedural aspects of the Crown's duty to consult and accommodate.

The complex nature and longevity of these offshore projects warrants more meaningful consultation and involvement of MFN and other affected Mi'kmaq Nations throughout the entire lifecycle of the projects. Moreover, proponents should coordinate this involvement to mitigate the cumulative effects

of the oil and gas industry on the health and socioeconomic conditions of Indigenous communities. Due to the complexity and number of projects and documents that must be reviewed, MFN requires adequate capacity funding and support to enable:

- a) effective understanding and evaluation of technical and regulatory documentation;
- b) community-based decision making, with specific attention to MFN's Aboriginal fishery, about MFN's response to offshore projects such as the Tilt Cove; and
- c) planning and preparation to enable MFN's involvement and participation in the regulatory process and the potential socioeconomic accommodations and opportunities MFN may wish to pursue associated with the projects.

Furthermore, the complex and ongoing nature of the Tilt Cove Project (and other offshore projects) requires a sustained and organized approach to involvement and consultation with Indigenous peoples in environmental oversight. To address these issues, MFN recommends the development of an **Indigenous Environmental Advisory Committee (IEAC)**, dedicated to oversight of the offshore oil/gas projects.

Recommendation 1: MFN firmly believes that an Indigenous Environmental Advisory Committee (IEAC) must be formed, as soon as possible, to provide a forum for ongoing consultation and oversight on potential impacts and mitigation/accommodation measures for MFN's rights and interests and those of and other affected Mi'kmaq Nations, for this Project and other offshore projects. Members of the IEAC may include representatives from potentially affected Mi'kmaq Nations, the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB), the Impact Assessment Agency of Canada (IAAC), and other relevant provincial/federal agencies. The mandate of the IEAC should be guided by a Terms of Reference codeveloped by Indigenous Nations and the previously mentioned agencies. The Proponent, or a consortium of proponents, must provide sufficient funding to support the IEAC in its endeavors. The IEAC would act as a technical advisory committee and would be responsible for:

- Identifying common priorities (economic development opportunities, environmental research initiatives, knowledge gaps, mitigation measures, etc.) between Indigenous communities and provide a framework for exploration.
- Providing informed advice to the IAAC, C-NLOPB, and the industry on addressing concerns and impacts to Indigenous Rights and interests.
- Overseeing the continued collection and incorporation of Indigenous Knowledge through community-led Indigenous Knowledge studies.
- Reviewing and providing input on all monitoring programs, response plans, etc., including, but
 not limited to, the Fisheries Communication Plan, Spill Response Plan, Spill Impact Mitigation
 Assessment, seabed investigation survey results, and results from the various follow-up
 monitoring programs.
- Ensuring regional consultation and engagement with community leadership, Elders, and Indigenous monitors from impacted communities.
- Enabling Indigenous Nations to participate in the oversight of offshore oil and gas projects. The IEAC may enable and support Indigenous Monitors to work alongside Environmental Monitors

(EMs), Marine Mammal Observers (MMOs), etc., during environmental effects monitoring and follow-up programs. This Indigenous Monitoring Program will help to build capacity within the C-NLOPB, IAAC, and industry to better understand and incorporate Indigenous Knowledge into the monitoring of offshore oil and gas infrastructure. It will also facilitate the sharing of capacity between the various environmental experts involved in the industry and Indigenous communities.

 Review and provide comments on the results from environmental effects monitoring and follow-up programs and provide input on adaptive management approaches.

Comment 2: Suncor indicates that a capping stack will be sourced through their membership with Oil Spill Response Limited (OSRL). The Proponent acknowledges that the location of the capping stack and resulting transportation times will be a factor in the time required to kill the well. Suncor provides a range for deployment of 30 days. It is apparent that a locally sourced capping stack would allow for more rapid deployment and, thus, a significant reduction in impacts to the marine environment.

Recommendation 2a: MFN asserts that it is critical to have a locally managed capping stack, deployment entity, and appropriate capacity for equipment modification and rapid staging and deployment situated in Newfoundland or Atlantic Canada to mitigate the risks associated with an uncontained blowout. This is important on a project-level basis, but also to account for the cumulative risks of all current and future exploratory and production oil and gas projects. We would also support the formation of a consortium, similar to the Marine Well Containment Company (https://marinewellcontainment.com/), whose purpose is to provide at-the-ready state-of-the-art well containment services and technology to operators in the U.S. Gulf of Mexico. Similar industry-led consortia exist in other geographies where offshore oil and gas drilling is commonplace, such as the Helix Well Containment Group (https://www.hwcg.org/) that also serves the Gulf of Mexico and WellCONTAINED (https://wildwell.com/well-control/wellcontained/), which has capping stacks in Scotland and Singapore. MFN's proposed locally managed entity may also be involved in the continual research and development of best available and safest technology (BAST). Whether this effort is funded by a consortium of all offshore oil and gas proponents in Atlantic Canada and/or the Crown is of no consequence to MFN; someone must fund and ensure this critical risk mitigation measure to protect MFN's rights, and to reduce the inequitable burden of risk MFN bears in relation to the exercise of our rights.

Recommendation 2b: Suncor indicates that a Environmental Protection Plan, a Safety Plan and Contingency Plans, including an Emergency Response Plan [ERP] and an Oil Spill Response Plan (OSRP), will be developed for the Project. MFN requests that these plans be provided for review upon development.

Comment 3: For information pertaining to MFN Indigenous Knowledge (IK), Suncor has nothing. There were attempts to meet but for various reasons, including challenges associated with COVID-19, no meetings occurred. Limited information was shared through telephone conversations, emails and letter correspondence. Otherwise, all information was sourced from publicly available land claim documents, government documents and data, the community website, and reports and studies completed for other projects. This is not a meaningful attempt by the Proponent to incorporate MFN's Indigenous Knowledge into the Project. To date, MFN has yet to complete a thorough community-led Traditional Knowledge and Land Use Study for the Project Area. The collection of this knowledge takes planning, time, coordination, and resources. IK is a living body of knowledge that is passed down through generations. Individuals grow in their knowledge throughout their entire lives by listening,

observing, and doing. IK is also often rooted in the natural world and can be very specific and detailed when it comes to places and landscapes. This knowledge is incredibly valuable for informing design, mitigation, monitoring, impact assessment and accommodation. It is being omitted to the detriment of the EA process.

Thus far, there have been no meaningful attempts by the Proponent, or the Crown represented by the IAAC, to collect or integrate any IK from MFN.

Recommendation 3: IK is difficult to collect and document and must be done with care and to appropriate standards to ensure it is authentic, verifiable, representative, and defensible. In addition, sensitive information cannot just be handed over to the Proponent without ensuring that the proper protocols and protections for MFN and any participating community members' intellectual property (IP) and confidentiality are in place. MFN requires that sufficient resources for the collection of the information requested be provided. This should be completed in accordance with MFN's engagement protocol. Without this highly important baseline information (both in terms of the IA process and the process to determine potential impacts to MFN's S. 35 and other Aboriginal Rights), the IA must be considered incomplete. MFN has shared its Guidebook for the Collection of Aboriginal Traditional Knowledge with the Proponent. This detailed guide provides information on the formative steps and methodology necessary for a successful IK study that is protective of MFN's rights and interests. For the IA process to be completed such that the Honour of the Crown and the Crown's obligations are met, the Proponent and/or IAAC must provide accommodations in the form of resources to MFN for internal coordination, the collection of IK, and reporting. Although the proponent is delegated procedural aspects of the duty to consult and the environmental assessment process, it is ultimately the responsibility of the Crown to ensure that this IK is then meaningfully considered and incorporated into the IA process, the Crown consultation process, and any further Crown accommodations necessary.

Comment 4: The southern Newfoundland population of Atlantic salmon is considered threatened by the Committee on the Status of Endangered Species in Canada and already faces many risks. The people of MFN have witnessed the continual and alarming decline of this species because of a range of factors including aquaculture, overfishing, forestry, and at-sea mortality. Returns of adult salmon to the Conne River reached an estimated 398 individuals in 2019, a drop from approximately 454, 712, and 1,230 during the years of 2018, 2017, and 2016 respectively (Fisheries and Oceans Canada [DFO], 2019; pers. comm. Brian Dempson, DFO). This is down from an average of 2,432 from 1992–2016 and highs of 10,000 reached during the 1980s (Dempson, O'Connell, & Schwarz, 2004).

The continued exploration and production of oil in offshore Newfoundland will potentially exert direct impacts and cumulative effects on Atlantic salmon through seismic effects, changes to water quality, major accidents and malfunctions, and more. These effects may cause stress to migrating salmon, induce behavioural changes, reduce feeding efficiency and, in limited circumstances, direct mortality. Atlantic salmon migrate through the Project Area on their way to feeding grounds, and again on their return journey to Conne River and other rivers on the south shore of Newfoundland. The population of these salmon is already in such a poor condition that additional cumulative effects may further increase at-sea-mortality, resulting in the extirpation of salmon from rivers in MFN Traditional Territory, rivers that have had healthy salmon runs since time immemorial. Any negative effects to Atlantic salmon from the Project would represent a direct impact on the rights and interests of MFN.

Recommendation 4a: Due to the value of Atlantic salmon to the MFN community, the continual decline in numbers of returning adults, and the potential effects of the Project, it is necessary that the Proponent and Canada apply the precautionary principle to mitigate potential harm, especially given the already extremely fragile state of the stock. Moreover, any serious harm to fisheries must be offset through an Authorization under the Fisheries Act. This may be achieved, in part, through the delivery of funds to MFN for engaging in a recovery strategies of Atlantic salmon in southern Newfoundland. This research would benefit the local restoration priorities for Atlantic salmon. According to the Fisheries Productivity Investment Policy: Proponent Guide to Offsetting (DFO, 2013), providing funding for this type of work can be considered a Complimentary Measure. The results of this feasibility study would be used to inform recovery actions taken by MFN, the province of Newfoundland and Labrador, and DFO.

MFN is currently undertaking actions to improve the state of the Atlantic salmon returns, including ongoing monitoring, installing incubaters (in-stream and in tanks), rearing smolts in offshore cages, and spawning wild-sourced broodstock. These efforts are costly, and any funding will go directly to these rehabilitation efforts.

Comment 5: The Proponent describes various environmental monitoring and follow-up programs that will be required. The results of these environmental monitoring and follow-up programs should be shared with the community. Also, as part of our accommodation measures, MFN requires that community members be provided with equitable opportunities in employment, training, and resource provision associated with these programs for the entirety of the project. MFN members have lived in the area for time immemorial and our input, opinions, and experiences would be a valuable asset to project construction, operation, and follow up monitoring.

Recommendation 5: MFN requires that environmental monitoring programs be developed in consultation with our nation. MFN also requires participation of community monitors in monitoring programs for fish and fish habitat, marine mammals and sea turtles, and migratory birds. MFN requests that the Proponent and/or the Crown provide or fund the necessary training for community members to participate in the project as monitors and the resources required for an annual community meeting in MFN to share the results of monitoring activities and for the MFN monitor(s) to be able to participate in presenting such results to the community. If results from environmental monitoring show that additional mitigation measures are required, MFN's input should be considered in the development and implementation of these additional mitigation measures as part of ongoing consultation.

4.0 CONCLUSION

MFN has not asked for this Project and currently sees few, if any, meaningful benefits arising from it for our community, and we do not wish to bear the risks associated with it. It is the perspective of MFN that the Project poses too great a risk to our Indigenous fisheries, our Brother Salmon, our environment, and our way of life. These concerns have been described by MFN on several occasions and highlighted by the spill and lack of clean up of 250,000 litres of oil from the SeaRose project in 2018.

When projects like the Tilt Cove are approved by the Crown, it is often Indigenous community members, like the members of MFN, who are forced to inequitably bear the risks and suffer any

negative consequences and environmental effects. Despite these risks, MFN has never come to any agreement with the Proponent regarding accommodation for impacts to our rights from, or consent for, this project. Furthermore, we are of the opinion that adequate meaningful consultation has not occurred to date—only information sharing. The poor planning and lack of consideration of our knowledge, rights and interests will only exacerbate the effects of the Project on our community. We continue to voice our concerns that the duty to consult has not been met, implementation of UNDRIP is not occurring and that the requirements of *CEAA 2012* and the new *Impact Assessment Act* are not satisfied. Ultimately this means that the Crown and the Proponent are far from satisfying their obligations for consultation and engagement with MFN. This is not in line with the legal requirements for consultation, nor in the spirit of Truth and Reconciliation.

Miawpukek First Nation is concerned about the potential risks to the environment and our way of life from the Tilt Cove Exploration Drilling Project. We are particularly concerned about the potential for oil spills, which could harm marine life, coastal habitats, and tourism. We are also concerned about the potential for water pollution, which could harm our fisheries and make the water unsafe for swimming, fishing, and other recreational activities.

Miawpukek First Nation is also concerned about the potential for climate change from the Tilt Cove Exploration Drilling Project. The burning of fossil fuels, including oil, is a major contributor to climate change. Climate change is already causing more extreme weather events, such as hurricanes, storms, and floods. These events can damage or destroy offshore oil rigs and infrastructure, and can also lead to oil spills.

Miawpukek First Nation calls on Suncor to consult with us and other Indigenous communities on the Tilt Cove Exploration Drilling Project. We have a right to be consulted on projects that could impact our land, water, and resources. We also have a right to be involved in the decision-making process. We urge Suncor to take our concerns seriously and to work with us to ensure that the Tilt Cove Exploration Drilling Project is safe for the environment and our way of life.

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