



Dear Stacy,

Thank you for the invitation to provide comments on the Notification of the Canada-Nova Scotia Offshore Petroleum Board (CNSOPB) Call for Bids NS17-1.

Mi'gma'we'l Tplu'taqnn (MTI) are concerned about the potential for any development in parcels 1-3 of NS17 to impact our Aboriginal and Treaty Rights. In particular, we are concerned about the potential impact of future development on the overall health of our waters, and on species which travel through the parcel footprint which have high cultural significance or on which we rely for our commercial, food, social, and ceremonial fisheries, including Atlantic salmon, American eel, and whales.

The parcels are also located adjacent to the St. Anns Bank Marine Protected Area, which may be affected by any future development along its border. Additionally, large areas of the Laurentian Channel (within the St. Lawrence Seaway) are being closed to activities due to presence of sensitive deep-water coral and sponges. This would likely be an issue in this area as well and is of concern to our people. There are also concerns around Salmon migration through the proposed area as well as some other culturally significant species (i.e. American Eel, Right Whale, etc.). Given the increased presence of some of these species as well as the sensitive nature of the stocks, a full assessment on how these activities will affect Aboriginal and Treaty rights will be in order. Many of our communities are also in the process of diversifying their commercial fisheries, which would not have been considered in the previous assessments of these lease areas (as some species previously were not available for commercial harvest but are on the verge of being commercially available again).

A brief review of the strategic environmental assessment (SEA) completed in 2014 revealed that the rights and concerns of the Mi'gmaq of New Brunswick were not considered beyond the potential impacts on communal commercial fishing. We require that the rights and concerns of the Mi'gmaq peoples of New Brunswick be considered as a part of any project environmental assessment that may arise in the future.

MTI's resources are extremely limited, and we are dealing with a large number of projects that impact on our territory and rights. While we intend to participate in the CNSOPB process for future environmental assessments, our limited funding will not provide adequate capacity in order to fully engage in this manner. Therefore, we would like to express our need for project-based capacity funding in order for us to conduct the necessary technical review, gathering of Indigenous Knowledge, and community engagement that will allow us to better understand the impacts of future projects on our Aboriginal and Treaty Rights. If this capacity funding is not available, we will be unable to fully participate in project EAs, and the duty to consult will not be met.

In conclusion, we are concerned that the lease of these parcels may result in projects that have a negative impact on Mi'gmaq rights. If the parcels are leased, the Mi'gmaq of New Brunswick expect to be fully consulted and capacity funding provided to enable us to participate in future EA processes.

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In Friendship,

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