



Netukulimkewe'l Commission

The Natural Life Management Authority for the Large Community of Mi'kmaq / Aboriginal Peoples who continue to reside on Traditional Mi'kmaq Territory in Nova Scotia undisplaced to Indian Act Reserves.

P.O. Box 1320
Truro, Nova Scotia
B2N 5N2

June 16, 2004

Tel: 902-895-7050
Toll Free: 1-877-565-1752
Fax: 1-902-895-8182

E-Mail:
netcomm@ncnsnetcomm.ns.ca

Ms. Erin Palmer, BSc.
Environment Analyst
Canada-Nova Scotia Offshore
Petroleum Board
1791 Barrington Street
Halifax, Nova Scotia
B3J 3K9

CNSOPB Rec'd			Date: JUN 15 2004
TO	Action	Info/Copy	
CAP/ET/BBP			
origs to file.			
			4571
30,008.14 / BASO,001			

- Netukulimkewe'l Commission
- Mi'kmaq Harvest Management Office
- Netukulimk Prefects
- Aboriginal Fisheries Public Relations Facilitator
- Regional Netukulimk Advisory Councils
- Protocol Secretariat
- Mi'kma'ki Environments Resources Developments Secretariate (MERDS)

**RE: BEPCo Canada Company Exploratory Drilling on EL 2407
SCOPE OF COMPREHENSIVE STUDY**

Dear Ms. Palmer:

The Native Council of Nova Scotia Mi'kmaq/Aboriginal Peoples Community respond to the CNSOPB News Release of May 26, and your E-Mail of June 2, with written comments on the Scope for the Environmental Assessment for the BEPCo Canada Company Exploratory Drilling Program on Exploration License 2407.

Page 3, Factors in accordance with subsection 16 (1)

There exist ample pronounced "objectives", documented "principles", issued "guidance" and established "jurisprudence", advancing the significance of establishing an early "consultation" process with Aboriginal Peoples. For Aboriginal Peoples who express and have an interest in a resources development

From the Office of:

project, early and direct Consultation between the Proponent; and in our case the NCNS Mi'kmaq/Aboriginal Peoples Community, can among other matters, improve the Environmental Assessment, help fulfill governments responsibilities regarding potential impacts on our rights, promote communications, help the CNSOPB in their review of the "benefits plan" requirements, and help establish project-term co-operative working relationships.

We request that the scope in this section add a fifth bullet:

- The issues, concerns, needs, interests, and knowledge shared, and the accommodation mitigation arrangements developed through a direct, effective, meaningful, consultation process with interested Aboriginal Peoples;

Section 8.0

The Accord and mirror legislation of governments, require a "projects benefits plan" to be prepared and filed for oil and gas development works, activities and projects in the Canada-Nova Scotia Offshore. The environmental assessment can assist the Proponent and Regulatory Authorities to put a plan into context where the environmental assessment includes socio-economic conditions of traditionally under represented and disadvantaged Nova Scotians.

Do we assume in the table summary of Environmental Assessment Considerations, that the reference to "Aboriginal Interests" are the many social economic interests in access and use of resources, the ocean environment including oil and gas resources development operating in a shared ocean environment? Would an assessment of interests include consideration of the demographic and socio-economic conditions of the NCNS Mi'kmaq/Aboriginal Peoples Community?

Through which mechanism, will the Environmental Management System and its components, be developed, and how will it engage "fisheries interests", "Aboriginal Communal Commercial Fisheries interests", and "fisheries management interests"? How will the factors assessed be determined to include or not include in developing a "fisheries compensation program"?

The vision for oil and gas resources developments in an ocean environment shared with many other interests is to harmonize all interests to build lasting social and economic structures to take advantage of opportunities. The interests include that of Oil and Gas Resources Companies, Fishers, Shipping, Telecommunications, Oceanography, Science, Environment, Nova Scotians and more.

How and who will determine the affected parties short-term and long-term?

Generally save for our comments on "direct consultation" and "environmental management" the scope of Comprehensive Study is comprehensive for BEPCo Canada Company exploratory drilling program on Exploration Licence 2407.

In closing, we remain available to work co-operatively with the Proponent, and we wish BEPCo Canada Company every good success in the regulatory process, and their drilling projects. May they be safe and rewarding for the benefit of all interests: BEPCo, Aboriginal Peoples, Nova Scotians, Canadians, and the living ocean environment and its resources now and for future generations to come.

**Progress through consultation, accommodation
and participatory involvement and partnerships**



Roger J. Hunka
MERDS, Advisor/Facilitator

c.c. Derek McDonald - CEAA
Patrick Blanchard - Bass Enterprises