

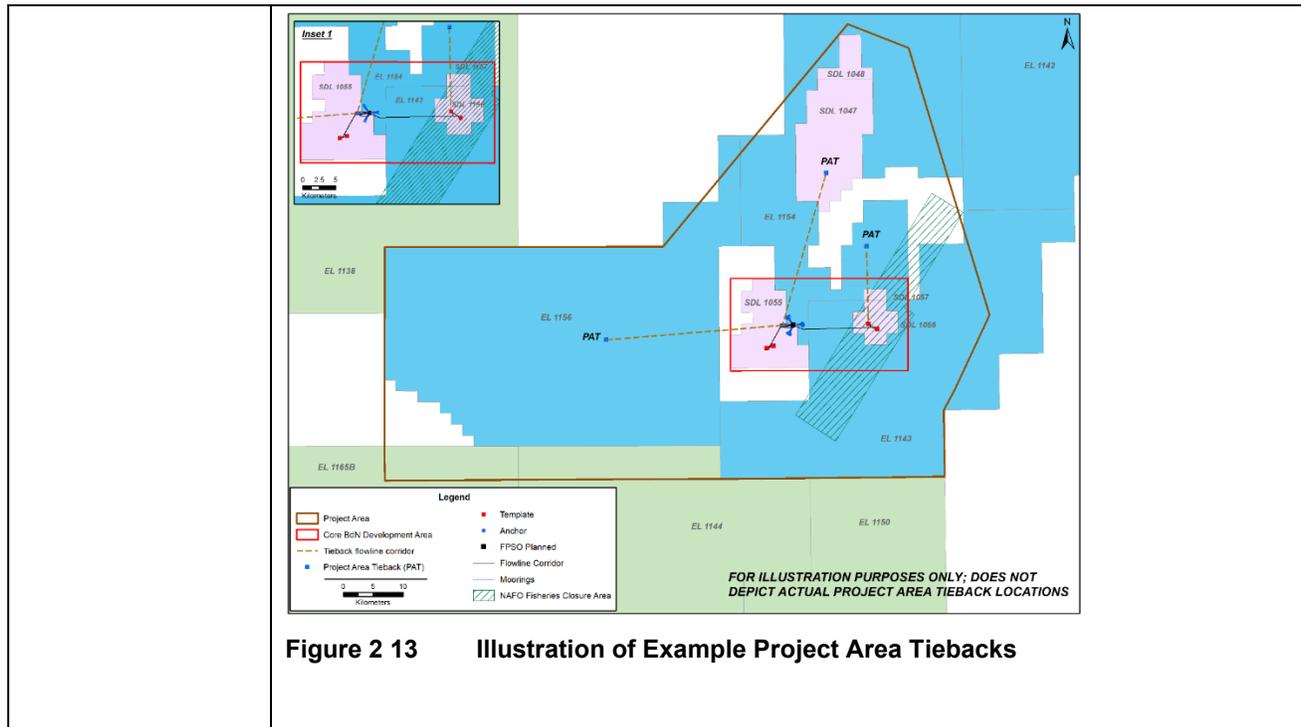


**Bay du Nord Development Project
Environmental Impact Statement (CEAR 80154)
Response to Information Requirements from IAAC
Public Review Process**

(CEAR 80154)

December 9, 2020

Public Review IR-1	Guideline Ref: N/A	EIS Ref: Section 2.6.6
CEAA-01		
Context/Rationale	<p>Within the EIS and during discussions in the public virtual information sessions, Equinor Canada has described the tieback threshold distance for future well site development to be 40 kilometres. The Agency confirmed with the Canada-Newfoundland and Labrador Offshore Petroleum Board that 40 kilometres is the technically feasible distance to the production installation. Therefore, the Agency requires information that explains why the spatial boundary for the Future Development Project Area exceeds the 40 kilometre range, in some directions, from the proposed location of the FPSO. The Agency requires this information in order to determine the extent to which the Agency will assess and condition where project activities will take place.</p>	
Specific Comment	<p>Provide the rationale for the portions of the Project Area boundary that exceeds the 40 kilometre threshold distance from the FPSO located in the Core Development Area.</p>	
Equinor Response	<p>As noted in Section 2.4 of the EIS, Equinor Canada Ltd. holds interests in a number of exploration licences and SDLs near or adjacent to the SDLs for the Core Bay du Nord Development (SDLs 1055, 1056, 1057, 1058), notably ELs 1043, 1054 and 1056 and SDLs 1047 and 1048. Collectively these ELs and SDLs are used to define the Project Area for the BdN Development (refer to Figure 2-1 of the EIS).</p> <p>As noted in the BdN EIS, should future resource potential be discovered in these adjacent licences, they could be “developed and produced from the Project existing production installation through the addition of subsea tiebacks...Based on current technology, tiebacks to the production installation and/or existing templates may be feasible up to a distance of approximately 40 km” (emphasis added). The distance upon which tiebacks may be feasible depend on a number of factors including reservoir pressure, fluid properties, seabed bathymetry and reservoir drainage strategy, therefore 40 km is used as an estimate; some tiebacks may be less than 40 km and others may be somewhat greater than 40 km. As illustrated in Figure 2-13 of the EIS (copied below) tiebacks may be direct to the FPSO or tied-in via an existing well template subsea infrastructure. The BdN EIS included the assessment of Project activities, including tiebacks, throughout the Project Area, inclusive of Equinor Canada’s exploration and significant discovery licenses in the area. The environmental effects of the activities associated with tiebacks, which includes up to five tiebacks and 20 additional wells, at any location within the Project area are considered and assessed in the BdN EIS</p> <p>While not explicitly stated in the EIS or the initial Project Description (Equinor 2018), the scope of the Bay du Nord Development Project includes a single production installation from which production activities will occur, including tiebacks. If an additional production facility were proposed in the future it would be subject to a separate environmental process. As noted in the EIS, preliminary design of the FPSO includes provision for up to five tiebacks to the FPSO or well templates. Based on our understanding of legislative environmental assessment requirements (<i>Impact Assessment Act</i> and Physical Activity Regulations (SOR/2019-285)), development of an additional production installation(s) would require a separate environmental assessment.</p>	



Public Review IR-2	Guideline Ref: Part 5	EIS Ref: Section 3.0, Subsection 3.3.2
KMKNO-03, 04		
Context / Rationale	<p>With respect to engagement activities conducted by the proponent, Section 5 of the EIS guidelines requires that the EIS “document the main issues and comments raised during the engagement activities by each group and the proponent’s responses.” Further, the EIS guidelines requires the proponent to document where and how Indigenous groups perspectives were integrated into and/or contributed to decisions regarding the project, design, construction, operation, decommissioning, maintenance, follow-up and monitoring and associated potential effects (paragraph 5(1)(c)) and the associated mitigation utilized to manage those effects. The effects and mitigation measures should be clearly linked to valued components in the EIS as well as to specific project components or activities.”</p> <p>Section 3.3.2 of the EIS includes “Key Issues” tables (3.3; 3.5; 3.7; 3.9; 3.11; 3.13; 3.15; 3.17; 3.19; 3.21; 3.23; 3.25; 3.27; 3.29; 3.31; and 3.33). Indigenous groups have indicated that the descriptions in the “Key Issues and Questions Raised” columns are too high level and that the response provided does not address the issue. Example: KMKNO indicates it raised concerns related to the cumulative effects of the offshore projects on Aboriginal rights to fish for food, social and ceremonial purposes, Treaty rights including a right to fish for a moderate livelihood, and commercial communal fishing licences; however, the summary of issues provided only states “Cumulative Effects” (which KMKNO indicates does not respond to the concerns they raised).</p> <p>In order to assess the adequacy of the responses provided and complete the environmental assessment report and consideration of potential conditions, the Agency requires the specific details of all key issues or comments brought forward by Indigenous groups.</p>	

Public Review IR-2	Guideline Ref: Part 5	EIS Ref: Section 3.0, Subsection 3.3.2
KMKNO-03, 04		
Specific Comment	<p>For each entry in the “Key Issues and Questions Raised” columns in Tables 3.3- 3.33 in Section 3.3.2 of the EIS, provide details on the specific comment, issue or concern raised by the Indigenous group.</p> <p>For each specific comment, issue or concern, provide a description of how it was used in the effects assessment; and, if any potential effects or impacts on Indigenous peoples were predicted (yes or no); if yes, indicate what mitigation measures and follow up and monitoring programs are intended to manage these effects or impacts.</p>	
Equinor Response	<p>Equinor has undertaken a complete review of all comments received during the IG engagement in support of the BdN Development Project EIS. Equinor concurs that in some instances there is an opportunity to provide additional clarification to illustrate how the valued commentary was integrated and utilized in the EIS to guide research and the resultant effects assessment. In the following response Equinor has expanded on the “Key Issues” tables in Section 3.3.2 of the EIS (Tables 3.3; 3.5; 3.7; 3.9; 3.11; 3.13; 3.19; 3.21; 3.23; 3.25; 3.27; 3.29; 3.31; and 3.33) to ensure the following, when deemed necessary:</p> <ul style="list-style-type: none"> - the better identification of appropriate sections to facilitate EIS navigation - that additional relevant information in the EIS was emphasized - the specification of information from the EIS where previously a response was general <p>Tables 3.15 and 3.17 were not updated as Millbrook First Nation and Sipekne’katik First Nation, respectively, did not identify concerns during engagement sessions.</p> <p>Please note that while the responses represent an improvement in clarity to the noted tables, the responses comprise only of information that is already included in the EIS . No new data or assessment has been provided.</p>	

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Project Schedule – questions concerning timing of key Project activities	Details respecting the Project schedule, including timing of key Project activities and regulatory processes have been provided to Indigenous groups during Equinor Canada’s ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings. A full discussion of the Project schedule and associated activities and milestones is contained in EIS Chapter 2.	Section 2.1.1	Please refer to the noted Response and EIS Reference.
Treatment of Discharges (Produced Water) and potential impacts on fish and fish habitat	Equinor Canada will treat produced water as well as other discharges using best treatment practices that are commercially available and economically feasible. A description of the proposed treatment package for produced water is provided in Section 2.7.1.5 of the EIS. All discharges will be treated in accordance with applicable regulatory requirements and the OWTG. The potential impacts of emissions and discharges on Fish and Fish Habitat are identified and assessed in Chapter 9.	Section 2.7.1.5 Section 9.3.2.4 Section 9.4.2.2 Section 9.2.3.2 Section 9.2.3.3	<p>What we heard during engagement: Produced water concentrations in water after treatment Salinity level of produced water</p> <p>How the issue was addressed in the EIS: Produced Water Section 2.7.1.5 provides information related to produced water management. A three-stage water treatment process has been selected, consisting of hydrocyclones, compact floatation units and a final de-gassing drum. The oil-in-water concentration at discharge is expected to be less than the Offshore Waste Treatment Guidelines (OWTG) (NEB et al. 2010) performance target of 30 mg/L (monthly rolling average). New installations in the Norwegian Continental Shelf (NCS) are applying a best available technology assessment and risk evaluation to determine a suitable produced water management strategy (e.g., treat and discharge or reinjection) (Nesse et al. 2016). Production facilities discharging produced water on NCS achieve oil-in-water concentrations lower than 30 mg/L, and some facilities have an annual average of 15 mg/L (Nesse et al.</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>2016).The assessment of alternatives for management of produced water will be further discussed in the Development Application required under the Atlantic Accords Acts.</p> <p>Section 14.2.2.2 summarizes potential effects related to marine discharges and concludes that disturbances to fish species from discharges and emissions will be localized at any one location. It is therefore unlikely that marine resources will be affected by discharges and emissions from the FPSO in a manner and to a degree that would translate into effects on the overall availability or quality of a marine resource, and thus, on the overall nature, intensity, or economic value of commercial-communal fishing. It was concluded in Chapter 9, that as there is no interaction associated with these discharges and emissions on marine fish species, there is no interaction with commercial-communal fisheries.</p> <p>Salinity level in produced water Section 9.3.2.4 and Appendix J indicate that preliminary data suggest that the salinity of produced water and cooling water associated with the BdN Development Project will be very similar to seawater.</p> <p>Impact to fish and fish habitat Section 9.3.2.4 provides an assessment on potential impacts of produced water on fish and fish habitat. Potential adverse effects from marine discharges would be highly localized. Produced water discharges will be rapidly dispersed in the receiving environment, minimizing potential thermal or chemical environmental effects. In modelling of produced water conditions with the highest potential for environmental effects, the area</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			of effect was localized to within 100 m of the FPSO. It is predicted that the Project will not result in significant residual adverse effects on Marine Fish and Fish Habitat
Accidents and Malfunctions (spill modelling) – information about possible spill trajectory and spill response	Chapter 16 provides a description of potential accidental events and malfunctions. Equinor Canada has undertaken spill fate and effects modelling of representative worst-case spills, including an unmitigated subsurface blow-out. The results of modelling predict that the greatest concentration of surface hydrocarbons will be at the release site and the majority will be transported east and south. In the extremely unlikely event of a subsurface blowout, and without the application of mitigation measures, modelling indicates that less than one percent of the total volume released is predicted to make contact with the shore line and most of that oil is predicted to make contact on the Avalon Peninsula and localized areas of the Burin Peninsula. Oil making contact with the shoreline would be highly weathered, and degraded and patchy and discontinuous. Equinor Canada’s spill response measures are set out in Chapter 16 and additional information on Well Intervention Response Strategies and related matters is contained in Appendices N and O. Equinor Canada is prepared to effectively respond to an oil spill offshore and is equipped with the necessary response tools, personnel and strategies. A key focus is on prevention. Spill prevention will be incorporated into Project design and operations and facilities, processes and management system procedures are intended to reduce or eliminate the chance of a spill. All plans respecting a response to accidental events are	Section 16.1 Section 16.4.3 Section 16.4.4 Section 16.7.3 Appendix N Appendix O	Please refer to the noted Response and EIS Reference.

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	submitted to the C-NLOPB for review and approval as part of the regulatory authorizations process.		
Impact of Project on subsistence and commercial fish species	<p>Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge Desktop study, Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. Information on fish species of either traditional or commercial importance has been incorporated into baseline information (see Chapters 6 and 7) and the potential effects (both direct and indirect) of the Project upon marine fish and fish habitat, commercial and subsistence fisheries and associated mitigation measures are discussed in Chapters 9, 13 and 14 respectively.</p> <p>These chapters conclude that no potential effects upon subsistence fishing activities from routine Project activities are predicted. While no significant adverse effects upon commercial fish species or the commercial fisheries are predicted, proposed mitigation measures for commercial fisheries will include the following:</p> <ul style="list-style-type: none"> • Ongoing communication with commercial fishers regarding planned Project activities, including notification of coordinates of safety and/or anti-collision zones. • Ongoing communications with the NAFO Secretariat, through Fisheries and Oceans Canada (DFO) regarding planned Project activities, including timely communication of the anti-collision and/or safety zones. 	<p>Section 9.5.5 Section 9.5.6 Section 13.1.5 Section 13.2 Section 13.4 Section 13.5 Section 14.1.5 Section 14.1.5.1 Section 14.1.5.2</p>	<p>What we heard during engagement: Impacts to subsistence fishery (salmon, char, scallops) Impacts to offshore licences for snow crab, shrimp and turbot.</p> <p>How the issue was addressed in the EIS: See noted Sections for species-specific research and assessment. Section 14.1.5.2 details the Potential Environmental Changes and Effects to Commercial-Communal Fisheries and Current Use of Lands and Resources for Traditional Purposes.</p> <p>Section 14.4.3: It is predicted that, with the application of mitigation measures, the Project will not result in significant adverse effects on Indigenous Peoples.</p> <p>As stated previously, there is no recorded domestic commercial or commercial-communal fishing currently in the Core BdN Development Area and overall levels of commercial fishing in the Project Area are low. If, in future, commercial-communal fishing occurs in this area, the primary mechanism of interaction that may have direct adverse effects on commercial-communal fisheries would be the presence of the FPSO, associated subsea infrastructure, drilling installation(s), the establishment of anti-collision zones, and vessel traffic. As discussed previously, given the localized nature of Project infrastructure and its small physical</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<ul style="list-style-type: none"> • Ongoing communication with regulatory agencies to share information regarding the timing and location of activities. • Implementation of a standard marine communication protocol to promote safe practices between commercial fishing enterprises, other marine users and BdN operations. • Issuance of Notices to Shipping and Notices to Mariners (where appropriate) regarding planned Project activities. • Compensation for damage or loss in accordance with C-NLOPB Guidelines in accordance. <p>The effects of accidents and malfunctions upon subsistence and commercial fisheries are identified and assessed in Chapter 16.</p>		<p>footprint, and the availability of alternative fishing grounds, even were commercial-communal fishing activities to occur in the Core BdN Development Area, the presence of Project components and associated anti-collision zones would not have any direct effect on the commercial-communal harvest (in terms of catch rates, employment and revenue) and no detectable effect on the economy or well-being of an Indigenous community.</p> <p>Section 14.4.2: The identified Indigenous groups currently undertake traditional land and resource harvesting activities in their traditional territories which are generally near their communities. Potential adverse effects on marine-associated resources used by Indigenous groups for traditional purposes or otherwise are of cultural value are limited to possible effects on marine species that may migrate through the Flemish Pass prior to arriving in harvesting areas. The presence of such species in the Project Area is limited and the biological VC chapters (Chapters 9 to 11) respecting marine and migratory species have determined that the Project is not likely to result in significant residual adverse effects upon marine fish, marine or migratory birds, or marine mammals and sea turtles.</p> <p>The various mitigation measures identified throughout this EIS will help avoid or reduce associated effects on these species. While it is not possible to determine with absolute certainty whether an individual of any species (in any life history stage) used by one or more of these Indigenous groups may be present in the Project Area</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>before moving to an area that is the subject of traditional harvesting activity (particularly for juvenile stages of some species with extensive dispersion), the potential is extremely remote for any degree of connection between individuals within the Project Area and those harvested for traditional purposes. As a result, the Project is not anticipated to have an adverse effect on the availability or quality of resources that are currently used for traditional purposes, especially in a manner or to a degree that would alter the overall nature, frequency, location, timing, quality or cultural value of current land and resource use activities for traditional purposes. Therefore, no effects upon the current use of lands and resources for traditional purposes by Indigenous groups are predicted. Since no effects on the current use of lands and resources for traditional purposes are predicted, the Project will have no effects upon asserted or established Aboriginal or treaty rights.</p> <p>Similarly, routine Project activities are not predicted to result in effects on the socioeconomic conditions of the various Indigenous communities. Given the location of Project activities and the distance from Indigenous communities, routine activities are not predicted to interact with on-land or near-shore Indigenous activities that contribute to the socioeconomic conditions and well-being of Indigenous communities. Since residual effects on Marine Fish and Fish Habitat, including species harvested for traditional purposes, are determined to be not significant, no associated potential effects to socioeconomic conditions such as employment and business activity and income, community revenue, community-based services and</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			infrastructure, and availability of culturally important species in the Indigenous communities are predicted. With the application of mitigation measures and adherence to published and / or industry standards and best management practices, no effects from routine Project activities on Indigenous groups and their activities are predicted.
In response to IR-2, the following comments, while addressed in the EIS were not noted in the engagement tables.			<p>What we heard during engagement: Impacts of climate change from and on the Project</p> <p>How the issue was addressed in the EIS: With respect to air emissions, and greenhouse gases, an air emissions and dispersion modelling study was conducted to estimate the Project-related quantities of air contaminants and greenhouse gases (GHGs) released to the atmosphere and to predict associated ground-level concentrations of air contaminants in the vicinity of the Project. A summary of study results as well as other information respecting air contaminants and greenhouse gases is presented in Chapter 8 and in the Technical Data Report for Air Quality and Greenhouse Gases in Appendix K.</p> <p>Section 8.6.2 Annual GHG emissions from the Project were estimated to range from 176,183 t CO₂e/year to 257,715 t CO₂e/year depending on the Project phase. Based on these emissions, the magnitude of the Project's contributions to greenhouse gases would be considered medium. These emissions represent 2.4 percent or less of NL's emissions and 0.04 percent or less (i.e., a small</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>fraction) of the national GHG emissions reported by ECCC for the year 2016.</p> <p>Section 17.2.4</p> <p>In summary, increases are projected for air temperature and sea surface temperatures at the Project Area (with varied levels of confidence). Meanwhile, the frequency of high-speed hourly wind gusts is expected to increase slightly. Meanwhile, sustained (hourly average) wind speeds are projected to decrease slightly or remain unchanged. Annual precipitation volumes are projected to increase by up to 10 percent in the Flemish Pass. However, the number of precipitation events is projected to remain relatively unchanged (events are projected to be more intense). Most of the increase in annual precipitation volumes is projected to take place during the Winter months (with a decrease in summer and fall) and it is possible that fewer winter storms will occur due to a weaker jet stream (likely less but more intense winter storms). The number of tropical storms is not projected to increase in the Project Area, however, there is an increased likelihood of hurricane-linked storm events occurring in the Project Area (due to anticipated increases in hurricane strength in the Atlantic and the warmer sea surface temperatures at the Flemish Pass). Sea level and its rate of rising is projected to increase. Due to increases in air and sea surface temperatures, it is likely that there will be a reduction in sea ice extent, thickness, and duration (possible ice-free Arctic Ocean in September by mid-century). There is great uncertainty on the future of icebergs; however, warmer air temperatures could lead to an increase in iceberg</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>calving rates, but also lead to less obstructed routes from calving sites to the Project Area.</p> <p>What we heard during engagement: Impacts to SARA listed or migratory species that may migrate through any potentially impacted areas to the Marine Zone identified in the Labrador Inuit Land Claims Agreement</p> <p>How it was addressed in the EIS: See Sections 9.5/10.5/11.5 for details related to the effects assessment regarding species at risk.</p> <p>Section 9.6 For fish species at risk, the potential for interactions between individuals of these species and the Project is limited, and no identified critical habitat is present in the LSA. The Project will therefore not have implications for the overall abundance, distribution, or health of such species nor its eventual recovery. The Project is not predicted to result in significant residual adverse effects on marine fish species at risk.</p> <p>Section 10.6 With regard to avifauna species at risk, ivory gull and red-necked phalarope are the only such species that are likely to be found in the Project Area. During fall migration, there is some potential for Peregrine Falcons and nocturnally migrating landbird species at risk to be present and to be attracted to the Project. However, the potential for interactions between individuals of these species and the Project is limited, and no identified critical habitat is present in the LSA or RSA. The Project</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>will therefore not have implications for the overall abundance, distribution, or health of such species at risk nor its eventual recovery. The Project is therefore not likely to result in significant residual adverse effects on avian species at risk.</p> <p>Section 11.6 The potential for interactions between individuals of SAR and the Project is considered limited (with the likely exception of fin whales, northern bottlenose whales, and possibly Sowerby’s beaked whales), and no identified critical habitat is present in the Project Area, LSA, or RSA. The Project is not predicted to jeopardize the overall abundance, distribution, or health of SAR. With mitigation and environmental protection measures, the residual environmental effects on Marine Mammals and Sea Turtles (including SAR) are predicted to be not significant.</p> <p>What we heard during engagement: On-board storing and processing of oil</p> <p>Potential impacts of an underwater blowout and ship-based spills be included in the scenarios considered under accidents and malfunctions</p> <p>How it was addressed in the assessment: Specific Sections are as follows: Section 16.1 details Spill Prevention and Response Section 16.2 details the potential accidental event scenarios including those noted. 16.7.4 Marine Fish and Fish Habitat 16.7.5 Marine and Migratory Birds 16.7.6 Marine Mammals and Sea Turtles</p>

Table 3.3 Nunatsiavut Government Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			16.7.7 Special Areas 16.7.8 Commercial Fisheries and Other Ocean Uses 16.7.9 Indigenous Peoples

Table 3.5 Innu Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Need for Ongoing Engagement (Information exchange)	Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of such information-sharing processes will be developed through discussions with the various groups	Section 3.3 Section 3.3.1 Section 18.3 Section 18.4.1 Section 18.4.2 Section 18.5.1	Please refer to the noted Response and EIS Reference.
Publication of Monitoring Reports	Monitoring reports will be published in accordance with applicable regulations or as may be required by any conditions included in the environmental Assessment Decision Statement issue by the CEA Agency. Section 18.4 provides a complete listing of proposed environmental monitoring and observation programs for routine Project activities.	Section 18.4	Please refer to the noted Response and EIS Reference.
Accidents and Malfunctions – ecosystem impacts	Chapter 16 of the EIS contains an assessment of the potential environmental effects of accidents and malfunctions upon the marine ecosystem and human users, based upon various worst-case unmitigated spill modelling scenarios (batch spills, SBM spills, subsurface blow-outs and vessel collisions).	Section 16.7	Please refer to the noted Response and EIS Reference. Specifically: Section 16.7.4 Marine Fish and Fish Habitat Section 16.7.5 Marine and Migratory Birds Section 16.7.6 Marine Mammals and Sea Turtles Section 16.7.7 Special Areas

Table 3.5 Innu Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			Section 16.7.8 Commercial Fisheries and Other Ocean Uses Section 16.7.9 Indigenous Peoples
Spill Modelling methodology	<p>Chapter 16 provides a description of potential accidental events and malfunctions. Three-dimensional oil spill trajectory and fate modelling and analyses for worst-case unmitigated subsurface blowouts and batch spills of crude oil and marine diesel to support the evaluation of environmental effects of accidental events were performed, using the nearfield OILMAPDeep blowout model and the far-field Spill Impact Model Application Package (SIMAP) trajectory, fate, and effects model.</p> <p>The goal of modelling was to describe a range of possible consequences and exposures of oil releases under various representative scenarios, including that of an unmitigated subsurface blowout. Modelling was based on extremely conservative assumptions and approaches:</p> <ul style="list-style-type: none"> Extremely low probability worst case subsurface blowout rates were modelled, with the probability of occurrence of 1 in 207,000,000 to 1 in 414,000,000 95th percentile (i.e., worst case scenario) simulation of the results of the 171-172 deterministic model simulations were selected Batch spill scenarios modelled were very conservative with volumes being greater than the maximum volume of similar spills reported to the C-NLOPB since 1997 Worst-case environmental (weather) conditions were selected for modelling the batch spill scenarios 	Section 16.4	<p>Please refer to the noted Response and EIS Reference. Additional information on the model can be found in Appendix E.</p> <p>What we heard during engagement: Commercial Fisheries - concern for potential impact of spills and accidents (from FPSO or tanker traffic) on commercial fisheries as Innu Nation hold several commercial communal licenses in/around Project area.</p> <p>How the comment was addressed in the EIS: Section 16.7.9 details the Indigenous Peoples - Accidental Events Effects Assessment</p> <p>There will be little potential for biophysical effects (should they occur) upon marine species resulting from a spill to translate into a detectable decrease in the overall nature, intensity, distribution (location and timing) and quality of either the commercial communal fishery or the current use of lands and resources for traditional purposes, including any associated health, socio-economic or cultural conditions. Spill prevention techniques and mitigation measures, including development of a fisheries compensation program will be incorporated into the design and operations for all Project activities as part of contingency planning, which</p>

Table 3.5 Innu Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	All modelled scenarios were 'unmitigated' which assumes no spill response measures were taken. In an actual event, spill response measures would be implemented that would likely reduce the impact of a release.		will further reduce the potential for any effects to occur. Therefore, it is predicted that the residual effects of an accidental event upon Indigenous Peoples are not significant.

Table3.7 NunatuKavut Community Council (NCC) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation into the EIS
Accidents – potential impacts of spills on ecosystem	Chapter 16 of the EIS contains an assessment of the potential environmental effects of accidents and malfunctions upon the marine ecosystem and human users, based upon various spill modelling scenarios (batch spills, SBM spills, subsurface blow-outs and vessel collisions).	Section 16.7	Please refer to the noted Response and EIS Reference. Specific Sections are as follows: 16.7.4 Marine Fish and Fish Habitat 16.7.5 Marine and Migratory Birds 16.7.6 Marine Mammals and Sea Turtles 16.7.7 Special Areas 16.7.8 Commercial Fisheries and Other Ocean Uses 16.7.9 Indigenous Peoples
Project Description – relationship to exploration drilling	Details respecting the Project, including Equinor's exploration drilling activities, have been provided to Indigenous groups during Equinor Canada's ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. Chapter 2 of the EIS presents a detailed description of preliminary Project components and phases. Equinor's offshore experience globally and in	Section 2.1 Section 2.2 Section 2.3 Section 2.6.6	Please refer to the noted Response and EIS Reference.

Table 3.7 NunatuKavut Community Council (NCC) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation into the EIS
	offshore NL, including exploration drilling, is discussed in Chapter 1 of the EIS.		
Engagement with Indigenous Groups	Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of such information-sharing processes will be developed through discussions with the various groups.	Section 3.3 Section 3.3.1 Section 18.3 Section 18.4.1 Section 18.4.3 Section 18.5.1	Please refer to the noted Response and EIS Reference.
Economic Opportunities associated with Project	As part of the Development Application to be submitted to C-NLOPB, Equinor Canada will prepare a Benefits Plan and an associated Gender Equity and Diversity Plan. These plans will outline economic opportunities associated with the Bay du Nord Project.	Not within the scope of the EIS Guidelines	Please refer to the noted Response and EIS Reference.

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Equinor's Corporate Structure, Experience and Policies	Details of Equinor's corporate structure, experience, values and policies were summarized in a power point presentation transmitted to each Indigenous group (see Appendix G) and discussed at in-person meetings. Equinor's corporate structure, experience and policies are fully described in Chapter 1 of the EIS.	Section 1.1	Please refer to the noted Response and EIS Reference.
Project Concept and Design – footprint, number of wells, oil	Details respecting the Project, including Project concept and design, have been provided to Indigenous groups during Equinor Canada's ongoing engagement activities. In addition, Project details were summarized in a power	Section 2.5	Please refer to the noted Response and EIS Reference. Specific EIS section references: Number of wells – Section 2.3 Footprint – Section 2.5.4 and 2.6.6

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
transport, safety zone, tiebacks, spill response plan, flowlines and pipelines	point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. Chapter 2 of the EIS contains a detailed description of preliminary Project components, phases and activities.		Oil Transport – 2.6.4.4 Safety zone – 2.5.4 Tiebacks – 2.6.6 Flowlines and pipelines – 2.7.3 Spill response plan – 16.1
Impact on Commercial and FSC fisheries	Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge desktop study, Equinor is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. Information on species of either traditional or commercial importance has been incorporated into baseline information (see chapters 6 and 7). Potential effects (direct and indirect) on of the Project upon marine fish and fish habitat and commercial and subsistence fisheries and associated mitigation measures are discussed in Chapters 9, 13 and 14 respectively. These chapters conclude that no effects upon FSC subsistence fisheries from routine Project activities are predicted. While no significant effects upon commercial fish species or the commercial fisheries are predicted, proposed mitigation measures for commercial fisheries will include the following: Ongoing communication with commercial fishers regarding planned Project activities, including notification of coordinates of safety and/or anti-collision zones	Section 7.3.8 Section 9.5.5 Section 9.5.6 Section 13.1.5 Section 13.2 Section 13.4 Section 13.5 Section 14.1.5.1 Section 14.1.5.2	What we heard during engagement: Impacts to subsistence fishery Impacts to offshore licences for snow crab, shrimp and turbot. How the comment was addressed in the EIS: See noted Sections for species-specific research and assessment. Section 13.3 addresses the potential interactions and effects from Project activities on commercial fisheries. Section 14.1.5.2 details the Potential Environmental Changes and Effects to Commercial-Communal Fisheries and Current Use of Lands and Resources for Traditional Purposes. Section 14.4.3: It is predicted that, with the application of mitigation measures, the Project will not result in significant adverse effects on Indigenous Peoples. As stated previously, there is no recorded domestic commercial or commercial-communal fishing currently in the Core BdN Development Area and overall levels of

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>Ongoing communications with the NAFO Secretariat through Fisheries and Oceans Canada (DFO) regarding planned Project activities, including timely communication of the anti-collision and/or safety zones</p> <p>Ongoing communication with regulatory agencies to share information regarding the timing and location of activities</p> <p>Implementation of a standard marine communication protocol to promote safe practices between commercial fishing enterprises, other marine users and BdN operations</p> <p>Issuance of Notices to Shipping and Notices to Mariners (where appropriate) regarding planned Project activities</p> <p>Compensation for damage or loss in accordance with C-NLOPB Guidelines</p>		<p>commercial fishing in the Project Area are low. If, in future, commercial-communal fishing occurs in this area, the primary mechanism of interaction that may have direct adverse effects on commercial-communal fisheries would be the presence of the FPSO, associated subsea infrastructure, drilling installation(s), the establishment of anti-collision zones, and vessel traffic. As discussed previously, given the localized nature of Project infrastructure and its small physical footprint, and the availability of alternative fishing grounds, even were commercial-communal fishing activities to occur in the Core BdN Development Area, the presence of Project components and associated anti-collision zones would not have any direct effect on the commercial-communal harvest (in terms of catch rates, employment and revenue) and no detectable effect on the economy or well-being of an Indigenous community.</p> <p>Section 14.4.2</p> <p>The identified Indigenous groups currently undertake traditional land and resource harvesting activities in their traditional territories which are generally near their communities. Potential adverse effects on marine-associated resources used by Indigenous groups for traditional purposes or otherwise are of cultural value are limited to possible effects on marine species that may migrate through the Flemish Pass prior to arriving in harvesting areas. The presence of such species in the Project Area is limited and the biological VC chapters (Chapters 9 to 11) respecting marine and migratory</p>

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>species have determined that the Project is not likely to result in significant residual adverse effects upon marine fish, marine or migratory birds, or marine mammals and sea turtles.</p> <p>The various mitigation measures identified throughout this EIS will help avoid or reduce associated effects on these species. While it is not possible to determine with absolute certainty whether an individual of any species (in any life history stage) used by one or more of these Indigenous groups may be present in the Project Area before moving to an area that is the subject of traditional harvesting activity (particularly for juvenile stages of some species with extensive dispersion), the potential is extremely remote for any degree of connection between individuals within the Project Area and those harvested for traditional purposes. As a result, the Project is not anticipated to have an adverse effect on the availability or quality of resources that are currently used for traditional purposes, especially in a manner or to a degree that would alter the overall nature, frequency, location, timing, quality or cultural value of current land and resource use activities for traditional purposes. Therefore, no effects upon the current use of lands and resources for traditional purposes by Indigenous groups are predicted. Since no effects on the current use of lands and resources for traditional purposes are predicted, the Project will have no effects upon asserted or established Aboriginal or treaty rights.</p>

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>Similarly, routine Project activities are not predicted to result in effects on the socioeconomic conditions of the various Indigenous communities. Given the location of Project activities and the distance from Indigenous communities, routine activities are not predicted to interact with on-land or near-shore Indigenous activities that contribute to the socioeconomic conditions and well-being of Indigenous communities. Since residual effects on Marine Fish and Fish Habitat, including species harvested for traditional purposes, are determined to be not significant, no associated potential effects to socioeconomic conditions such as employment and business activity and income, community revenue, community-based services and infrastructure, and availability of culturally important species in the Indigenous communities are predicted. With the application of mitigation measures and adherence to published and / or industry standards and best management practices, no effects from routine Project activities on Indigenous groups and their activities are predicted.</p>
<p>Vessel Traffic – noise and discharges and impact on salmon</p>	<p>Potential environmental effects of vessel traffic (noise and discharges) upon marine fish, including salmon are identified and assessed in Chapter 9. The effects of sound were identified and assessed based on sound propagation modelling which included an assessment of</p>	<p>Section 9.3.5.3 Section 9.4.5.1</p>	<p>Please refer to the noted Response and EIS Reference. Underwater sound emissions are addressed in in Section 9.3.5.3, with specific references to scientific studies on underwater sound and Atlantic salmon. Vessel discharges are addressed in Section 9.1.5.1.</p>

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>the potential effects of vessel traffic sounds on fishes and invertebrates. Given the transitory nature of fish and the demonstrated avoidance behavior in response to sound, Equinor Canada predicts that it is unlikely that fish would remain in the vicinity of sound long enough to result in injury.</p>		
<p>Spills – treatment and response</p>	<p>Chapter 16 provides a description of potential accidental events and assessment of potential effects of a variety of spills on valued ecological components. Equinor Canada’s proposed mitigations and spill response measures are set out in Chapter 16 and additional information on Well Intervention Response Strategies and related matters is contained in Appendices N and O. Equinor Canada is prepared to effectively respond to an oil spill offshore and is equipped with the necessary response tools, personnel and strategies. A key focus is on prevention. Spill prevention will be incorporated into Project design and operations and facilities, processes and management system procedures are intended to reduce or eliminate the chance of a spill.</p> <p>All plans associated with a response to accidental events are submitted to the C-NLOPB for review and approval as part of the regulatory authorizations process.</p>	<p>Section 16.1 Appendix N Appendix O</p>	<p>Please refer to the noted Response and EIS Reference.</p>
<p>Sound – effects on marine life</p>	<p>Equinor Canada has conducted sound propagation modelling to assess the potential impacts of sound on marine life from various Project activities, including sound</p>	<p>Section 9.3.2.3 Section 9.3.3.3 Section 9.3.4.1</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>associated with vessel traffic. The potential effects of sound on marine fish, invertebrates, marine mammals and marine and migratory birds are identified and assessed in chapters 9, 10 and 11 respectively of the EIS. Sound monitoring during seismic surveys will be carried out. Section 18.4.2 provides information on sound monitoring.</p>	<p>Section 9.3.5.4 Section 10.3.1.1 Section 10.3.5.1 Section 10.4.5 Section 11.3.1.1 Section 11.3.2.1 Section 11.3.3.1 Section 11.3.4 Section 18.3 Section 18.4.2 Section 18.5.1 Section 9.4.1.3 Section 9.4.3.3 Section 9.4.4.1 Section 9.4.5.1 Section 11.3.5 Section 11.4.2.1 Section 11.4.3.1 Section 11.4.4.1 Section 11.4.5</p>	
<p>Community Investment</p>	<p>As part of the Development Application to be submitted to C-NLOPB, Equinor Canada will prepare a Benefits Plan and a Gender Equity and Diversity Plan. These plans will outline economic opportunities associated with the Bay du Nord Project</p>	<p>Not within the scope of the EIS</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Safety and Environment – compliance with regulatory standards	Equinor is committed to becoming an industry leader on safety and will comply with all regulatory standards respecting worker and environmental safety, as outlined in Chapter 1 of the EIS. Relevant legislation is listed in Chapter 1 and in addition, in accordance with the Atlantic Accord Acts and Section 6 of the Newfoundland Offshore Petroleum Drilling and Production Regulations, a Safety Plan must be approved by the C-NLOPB prior to the issuance of an Operations Authorization.	Section 1.3.2.2 Section 1.3.4	Please refer to the noted Response and EIS Reference.
Future Indigenous Engagement	Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of such information-sharing processes will be developed through discussions with the various groups.	Section 14.1.5.3 Section 14.5	Please refer to the noted Response and EIS Reference.
Incorporation of Indigenous Knowledge	Equinor Canada has made every reasonable effort to collect and incorporate traditional Indigenous knowledge into the EIS. Equinor Canada has invited Indigenous groups to provide traditional knowledge during the course of engagement and has, in addition, offered to enter into agreements for the collection of Indigenous knowledge. Equinor Canada also commissioned an Indigenous Knowledge Desktop Study. Information contained in this study, together with information from other sources, was taken into account in the development of the ecosystem	Section 14.1.4 Section 14,1,5,2 Appendix H	Please refer to the noted Response and EIS Reference. Clarification regarding how Indigenous knowledge was applied in the EIS is provided in Equinor’s response to IR-3.

Table 3.9 Miawpukek First Nation (MFN) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	approach throughout the EIS and was used to identify species of interest to Indigenous groups.		
Impact of Project on Indigenous Rights	Information regarding Indigenous rights is included in Chapters 7 and 14 of the EIS. It is Equinor Canada’s understanding that none of the identified groups have asserted or established Indigenous rights to, in or near the lands and waters of the LSA, including the Core BdN Development Area and the Project Area. Additionally, none of the Indigenous groups has identified any current use of lands and resources for traditional purposes or other forms of traditional activities in the LSA. There is also no overlap between the traditional territory of any of the 41 Indigenous groups listed in the EIS Guidelines and the Core BdN Development Area, the Project Area, or the LSA. However, Equinor Canada will continue to engage with Indigenous groups to further understand if there are any potential adverse impacts to Indigenous rights.	Section 14.1.5.1 Section 14.4.2 Section 14.1.5.2	Please refer to the noted Response and EIS Reference.

Table 3.11 Qalipu Mi’Kmaq First Nation (QMFN) Band Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation in EIS
<p>Environmental Effects Monitoring (scope)</p>	<p>Detailed information respecting follow-up and monitoring programs is contained in Chapter 18 of the EIS. The design of follow-up monitoring programs will be undertaken following finalization of Project design, taking into account Agency guidance, the terms of the EIS Decision Statement and relevant regulatory requirements.</p> <p>The follow-up monitoring program will be developed in consultation with the C-NLOPB and relevant government departments (e.g., DFO, ECCC). In addition, Indigenous groups and key stakeholders will be engaged, as appropriate. Preliminary discussions with Indigenous groups respecting proposed monitoring measures were held at three Workshops in October and Indigenous groups which did not participate in person were invited to provide comments in writing.</p> <p>The scope of follow-up monitoring programs will take into consideration the results of other offshore environmental effects monitoring programs (both previous and ongoing), employ technology specifically suited to the monitoring of a production project at 1200 m water depths and utilize Equinor’s global experience in EEM, ongoing research and new technologies.</p>	<p>Section 18.4</p>	<p>Please refer to the noted Response and EIS Reference.</p> <p>Updated references in EIS</p> <p>Significance tables at end of each chapter identify where follow-up monitoring is proposed for each effect.</p> <p>Table 9.18/19 Marine Fish and Fish Habitat</p> <p>10.7/8 Marine and Migratory Birds</p> <p>Table 11.9/10 Marine Mammals and Sea Turtles</p> <p>Table 12.7/8 Special Areas</p> <p>Table 13.7/8 Commercial Fisheries and Other Ocean Uses</p> <p>Table 14.6/7 Indigenous Peoples</p>

Table 3.11 Qalipu Mi’Kmaq First Nation (QMFN) Band Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation in EIS
Cumulative Effects on marine ecosystem	Equinor Canada has identified and assessed cumulative effects using the approach described in relevant CEA Agency guidance documents by considering the impact of the Project in combination with other past, present and future activities in the region upon each VC. As is the case with the assessment of intra-Project effects, an ecosystem approach will be adopted. The results of this assessment are set out in Chapter 15 of the EIS and it is Equinor Canada’s conclusion that that the Project is not likely to result in any significant adverse cumulative effects upon the marine ecosystem in combination with other projects and activities that have been or will be carried out in the RSA.	Section 15.2.6 Section 15.3.6 Section 15.4.6 Section 15.5.5 Section 15.6.5 Section 15.7.5	Please refer to the noted Response and EIS Reference.
Effects on species of concern (Salmon, American eel)	Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge Desktop Study, Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. During its ongoing engagement, Indigenous groups have placed particular emphasis upon salmon and American eel as species of cultural importance. Information on species of either traditional or commercial importance has been incorporated into baseline information (see chapters 6 and 7). Potential effects (direct and indirect) of the Project upon marine fish and fish habitat and subsistence	Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2	<p>What we heard during engagement: Impact on declining salmon population and research</p> <p>EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2</p> <p>EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2</p>

Table 3.11 Qalipu Mi’Kmaq First Nation (QMFN) Band Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation in EIS
	<p>fisheries and associated mitigation measures are discussed in Chapters 9 and 14 respectively. These chapters predict that no significant direct effects upon marine fish or fish habitat or any indirect effects (cultural, social, health or socio-economic) upon Indigenous persons are predicted to result from routine Project activities. The effect of accidents and malfunctions upon marine fish and fish habitat and Indigenous persons are discussed in Chapter 16.</p>		<p>Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF)</p>

Table 3.11 Qalipu Mi’Kmaq First Nation (QMFN) Band Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation in EIS
			<p>ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor, as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalised.”</p>
<p>Lack of capacity - funding</p>	<p>Questions associated with provision of capacity funding to Indigenous groups to participate in the environmental assessment process have been referred to the CEA Agency</p>	<p>Not within the scope of the EIS</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.11 Qalipu Mi’Kmaq First Nation (QMFN) Band Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and incorporation in EIS
Project design and components	Details respecting the Project, including Project concept and design, have been provided to Indigenous groups during Equinor Canada’s ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. Chapter 2 of the EIS presents a detailed description of preliminary Project design and components.	Section 1.2.2 Section 2.5 Appendix A.3	Please refer to the noted Response and EIS Reference.

Table 3.13 Kwilmu’kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Environmental Effects Monitoring – form, scope, and frequency	Detailed information respecting follow-up and monitoring programs is contained in Chapter 18 of the EIS. The design of follow-up monitoring programs will be undertaken following finalization of Project design, taking into account Agency guidance, the terms of the EIS Decision Statement and relevant regulatory requirements. The follow-up monitoring program will be developed in consultation with the C-NLOPB and relevant government departments (e.g., DFO, ECCC). In addition, Indigenous	Section 18.4	What we heard during engagement: Environmental Effects Monitoring – form, scope, and frequency, including monitoring the effects of noise on marine species and effects on birds. How the comment was addressed in the EIS: Please refer to the noted response for general information on the Monitoring and Follow-up Program. Updated references in EIS

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>groups and key stakeholders will be engaged, as appropriate. Preliminary discussions with Indigenous groups respecting proposed monitoring measures were held at three Workshops in October and Indigenous groups which did not participate in person were invited to provide comments in writing.</p> <p>The scope of such programs will take into consideration the results of other offshore environmental effects monitoring programs (both previous and ongoing), employ technology specifically suited to the monitoring of a production project at 1200 m water depths and utilize Equinor's global experience in EEM, ongoing research and new technologies.</p>		<p>Significance tables at end of each chapter identify where follow-up monitoring is proposed for each effect.</p> <p>Table 9.18/19 Marine Fish and Fish Habitat 10.7/8 Marine and Migratory Birds Table 11.9/10 Marine Mammals and Sea Turtles Table 12.7/8 Special Areas Table 13.7/8 Commercial Fisheries and Other Ocean Uses Table 14.6/7 Indigenous Peoples</p> <p>The following plans are discussed in Section 18.4.2 specific to monitoring the effects of noise on marine mammals and birds. Monitoring plans are subject to engagement with Indigenous groups and key stakeholders, as appropriate.</p> <p>Noise Equinor Canada will develop and implement a marine mammal and sea turtle observation program for 4D seismic survey programs. The Plan will include MMO requirements, shutdown and ramp-up procedures and reporting requirements. Frequency of reporting requirements will be developed in consultation with C-NLOPB and DFO and will, include documentation of marine mammal and sea turtle sightings.</p> <p>Birds</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>The options for a marine bird observation program include technology-based observations through the use of equipment such as bird radar, or through dedicated seabird observation programs from supply vessels similar to those undertaken by ExxonMobil Canada Properties at the Hebron Production platform (LGL 2017). Other operations have investigated the use of technology-based observations (i.e., bird radar) and it is understood that there may be some technical limitations to the use of the equipment in an offshore environment. Equinor Canada will further investigate the use of equipment such as bird radar to determine if it can be incorporated into the design of the FPSO. Equinor Canada will work with ECCC to develop an observation program that meets the needs of the Project.</p> <p>Routine systematic searches for stranded seabirds will be conducted on vessels engaged in construction and installation activities and HUC, the FPSO, drilling installation(s), stand-by vessels (SBVs), and during supporting surveys. Searches will be undertaken by vessel/installation crew, who have been trained in bird identification and handling. Equinor Canada will work with ECCC to develop installation/vessel-specific protocols applicable to the Project with respect to the systematic searches for, and documentation of, stranded birds. Appropriate programs and protocols for the</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>collection and release of stranded seabirds will be implemented. The program will consider the following existing protocols: ECCC's "Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada" (ECCC 2017). If a Species at Risk is found on the FPSO, drilling installation or SBVs, a report will be sent to ECCC for identification. In accordance with ECCC requirements, an annual report, including all occurrence data, will be submitted to ECCC that summarizes stranded and/or seabird handling occurrences.</p>
<p>Cumulative Effects</p>	<p>Equinor Canada has identified and assessed cumulative effects using the approach described in relevant CEA Agency guidance documents by considering the impact of the Project in combination with other past, present and future activities in the region upon each VC. As is the case with the assessment of intra-Project effects, an ecosystem approach has been adopted. The results of this assessment are set out in Chapter 15 of the EIS and it is Equinor Canada's prediction that that the Project is not likely to result in any significant adverse cumulative effects upon the marine ecosystem or upon human uses within that ecosystem in combination with other projects and activities that have been or will be carried out in the RSA.</p>	<p>Section 15.2.6 Section 15.3.6 Section 15.4.6 Section 15.5.5 Section 15.6.5 Section 15.7.5</p>	<p>What we heard during engagement: Assessment of cumulative effects of the offshore projects on Aboriginal rights to fish for food, social and ceremonial purposes, Treaty rights including a right to fish for a moderate livelihood, and commercial communal fishing licences.</p> <p>How the comment was addressed in the EIS: The cumulative effects assessment for the Indigenous Peoples VC is detailed in Section 15.7 and the residual effects predicted based on this assessment, as well as other VCs in Chapter 15 is summarized in Section 15.7.5, as follows: The Project will not result in residual adverse effects on:</p>

Table 3.13 Kwilmu'kw Maw-klusuaq Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<ul style="list-style-type: none"> • any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance • physical and cultural heritage • the current use of lands and resources for traditional purposes <p>The Project will have no residual effects upon the exercise of Aboriginal or treaty rights.</p> <p>The Project may result in residual adverse effects on commercial-communal fisheries. These residual effects are predicted to be not significant.</p> <p>This prediction is made with a high level of confidence based on an understanding of the general effects on commercial fisheries in the LSA.</p> <p>With the application of proposed Project-related mitigation and environmental protection measures, the residual environmental effects on Indigenous Peoples, including health and socioeconomic conditions are predicted to be not significant.</p>
Scale of offshore operations in Norway vs. NL	During an in-person meeting with KMKNO, Equinor Canada provided KMKNO with a graphic illustrating the relative intensity of oil and gas operations in offshore Norway and the North Sea in comparison with current activities in offshore NL. Details respecting Equinor and Equinor Canada's corporate structure, policies, values	Section 1.1	Please refer to the noted Response and EIS Reference.

Table 3.13 Kwilmu'kw Maw-klusuaq Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>and global offshore experience have been provided to Indigenous groups during Equinor Canada's ongoing engagement activities. In addition, corporate details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Equinor's offshore experience is described in Chapter 1 of the EIS.</p>		
<p>Environmental Effects – Ballast water and introduction of invasive species through ballast water</p>	<p>Equinor Canada considers prevention to be key in controlling the introduction and spread of aquatic invasive species. Although the likelihood that a Project vessel will result in the introduction and spread of an invasive species is relatively low, ballast water will be managed in consideration of applicable Canadian and international ballast water management requirements to reduce the potential spread of invasive species. Ballast water management is addressed in Chapter 2 and potential effects are discussed in Chapter 9.</p>	<p>Section 2.8.2 Section 9.3.4.1 Section 9.4.4.1</p>	<p>What we heard during engagement: Environmental Effects – Ballast water management, including treatment, and introduction of invasive species How the comment was addressed in the EIS: Please refer to the noted response and the following related to treatment of ballast water.</p> <p>As indicated, Section 9.1.5.1, marine discharges from vessels and the Bay du Nord FPSO, such as bilge and ballast water will be treated in accordance with regulatory requirements, and as such are considered not to have an effect on fish and fish habitat.</p>
<p>Decommissioning – removal of seabed infrastructure and impact on habitat</p>	<p>As stated in Section 9.2.6.2 of the EIS, there are two options for decommissioning of subsea infrastructure – leave the infrastructure in place or removal of the infrastructure. The effects of each alternative are described and assessed in Section 9.2.6.2 of the EIS.</p>	<p>Section 9.3.6 Section 9.4.6</p>	<p>Please refer to noted response and section from the EIS.</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Spills – effects on biophysical environment and human health	Equinor Canada has conducted spill modelling, using a worst-case scenario (unmitigated blow-out). The potential effects of spills on the biophysical environment and human health are discussed in Chapter 16.	Section 16.7	<p>What we heard during engagement: Water depth at which a capping stack is tested Research done on the impacts on fish/fish habitat from spills. Research related to impacts on human health. Research on marketability of fish, including due to perception. Research on hydrocarbons impacting the reproductive abilities of fish.</p> <p>How the comment was addressed in the EIS:</p> <p>Capping Stack Refer to Section 16.1.2.2 for details regarding the Well Capping and Containment Plan.</p> <p>Fish and Fish Habitat The research related to hydrocarbon spill effects on fish and fish habitat is detailed in Section 16.7.4. In consideration of the known effects of spills on Fish and Fish Habitat, the results of spill modelling exercises, and with the implementation of mitigation measures, it is predicted that the accidental events associated with the Project will not result in significant residual adverse effects on Marine Fish and Fish Habitat.</p> <p>Human Health Section 14.1.5.1 / 14.4.2:</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>Regarding discharges from routine Project-related activities, they will occur in the marine environment at a range of approximately 640 km to 2,000 km from the various Indigenous communities and their traditional territories, no direct effects on the physical or social health and well-being or economic conditions of Indigenous groups or communities are predicted. Routine Project activities are also not predicted to result in changes to the environment that would indirectly adversely affect the human health and well-being or socio-economic conditions of Indigenous groups or communities.</p> <p>Regarding a subsurface blowout, Section 16.7.9.4 provides assessment details. In summary, adverse effects on the health and well-being of Indigenous Peoples are unlikely. While there is a possibility of taint due to the exposure of fish to hydrocarbons, this is unlikely to translate into an adverse effect upon health and well-being due to the factors outlined previously. A subsurface blowout is extremely unlikely and there is a limited potential for any degree of connection between an individual member of a marine-associated species harvested for FSC purposes to be in the area of a spill before moving to a traditional harvesting area. With the application of mitigation measures and spill response plans, no significant effects on marine-associated</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>species are predicted and the imposition of closures around affected harvesting areas would further reduce the possibility of consumption of tainted species. While there may be the perception of taint even when results demonstrate safe exposure levels for consumption which can lead to avoidance of country foods, resulting effects based on perceptions of products are difficult to predict and may only be measured after an event occurs (ITOPF 2014) (see Indigenous Knowledge Study, Appendix H, for a discussion of the relationship between country foods and health, spiritual and cultural well-being). In the extremely unlikely event of a subsurface blowout, it will be important to communicate with communities and Indigenous groups, including providing information that may assist in understanding the incident and associated impacts, if any, including the perception of taint.</p> <p>Marketability of fish See Section 16.7.8.2 for research related to public perception regarding fish taint. The effects to Indigenous commercial-communal fisheries are considered in Section 16.7.9.4. A subsurface blowout may interact directly and indirectly with commercial-communal fishers. Depending on the size, nature and timing of the subsurface blowout, regulatory authorities may issue temporary closures of</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>fish harvesting in the immediate vicinity of the spill location. There is a potential for actual or perceived fish tainting from a subsurface blowout and this may affect marketability of affected commercial species. There could be loss of access to fishing areas, resulting in potential economic loss. If fishing were occurring at the time of the spill, gear and/or equipment may be fouled. The potential interaction of a subsurface blowout and commercial fisheries is discussed in Section 16.7.8 and the identification and assessment of potential effects, both direct and indirect, is equally applicable to commercial-communal fishers. With the implementation of response and mitigation measures, the magnitude and geographic extent of a subsurface blowout would be reduced. The issuance of Navigational Warnings and other communications will provide timely notice of closure areas for fishers to make alternate plans, thereby likely reducing effects on commercial-communal harvesting success. Avoidance will also reduce potential gear/vessel fouling and the likelihood of any tainted product entering the marketplace. A compensation program, as outlined in Section 16.7.8, will be implemented. The residual effects of a subsurface blowout on commercial-communal fisheries are predicted to be adverse, low in magnitude, medium-term</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>in duration, with a geographic extent greater within the RSA, not likely to occur and reversible in nature.</p> <p>Fish Reproduction See Section 16.7.4.3 for details regarding spill effects on fish, including reproduction.</p> <p>In the very unlikely event of a subsurface blowout, some degree of residual adverse effects to Marine Fish and Fish Habitat in the area at the time of the accident or malfunction are expected. The degree of exposure and thus the type and level of any such effects would depend on the type and size of spill, time of year, and the number, location, and species of animals within the affected area. Although there is the potential for effects on fish and their habitats in the RSA, these are, with appropriate mitigations, not likely to result in an overall detectable decline in overall fish abundance or change in the spatial and temporal distribution of fish populations in the overall RSA for multiple generations.</p>
Communal Commercial Fisheries, including effects on commercial species (snow crab) and	Current communal commercial fishing activities are described in Chapter 7 and the potential effects of the Project upon communal commercial fisheries is discussed in Chapter 13. No significant impacts upon communal commercial fisheries, including snow crab fisheries, are predicted. Equinor Canada will develop and implement a compensation program for damages experienced by	Section 7.3.8.1 Section 13.1.5.1 Section 13.2.4.2 Section 14.1.5.2 Section 16.7.8 Section 16.7.9	<p>What we heard during engagement: Snow Crab presence in the Project Area</p> <p>Compensation for losses:</p> <ul style="list-style-type: none"> • associated with commercial communal fishing • associated with food, social and ceremonial fishing • joint compensation plan with Indigenous groups

Table 3.13 Kwilmu'kw Maw-klusuaq Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
<p>compensation for losses</p>	<p>commercial and communal commercial fishers which result from Project activities. The program will be developed in consideration of the C-NLOPB Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activities (2017). The proposed compensation regime is discussed in greater detail in Chapters 13 and 16.</p>		<p>How the comment was addressed in the EIS:</p> <p>Snow Crab Please refer to Section 6.1.7.1 and Figure 6-7 for snow crab presence in the Project Area.</p> <p>In addition, Section 13.2 indicates that within the Project Area, available records indicate overall lower harvesting (primarily trawling for groundfish; small amount of snow crab with fixed gear) compared in other parts of the LSA. Within the Project Area, fishing intensity is greatest in the western area near the slope and is carried out primarily with otter trawls. There is very little to no activity within the Core BdN Development Area. The harvesting that might occur in the Core area would be limited groundfish trawling and possibly some surface longlining for large pelagic species.</p> <p>Compensation for losses The concern considered in the EA was regarding Health, Socioeconomic and cultural conditions and the potential Project effects on Atlantic salmon and other species of importance due to sound, discharges, cumulative effects. Also, potential effects on commercial-communal fisheries in the Project Area and need to ensure that compensation guidelines take cultural values into consideration. Understanding of spiritual, cultural and</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>social importance of Earth and natural resources to Indigenous people. Potential psycho-social effects.</p> <p>In Section 14.1.5.3, the mitigation committed to by Equinor is to develop and implement a compensation program which will be developed in consideration of the C-NLOPB Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activities (C-NLOPB 2017) and will be aligned with the Best Practices Document for Compensation Processes and Procedures that One Ocean is currently preparing.</p> <p>Furthermore, with respect to Accidental Events Section 16.7.8.3 indicates that Equinor Canada will develop and implement a compensation program for damages resulting from Project activities. This compensation program will be developed in consideration of the C-NLOPB Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activities (2017) and will be aligned with the Best Practices Document for Compensation Processes and Procedures that One Ocean is currently preparing. This plan will outline compensation procedures for actual loss or damages to commercial fisheries, including commercial-communal fishers, attributable to the operator. Losses and damages include loss of income, future loss of income and, with respect to any Indigenous peoples of Canada, loss of harvesting, fishing, and gathering opportunities.</p>

Table 3.13 Kwilmu'kw Maw-klusuaqn Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			Requirements from the C-NLOPB include the ability of an operator to demonstrate the financial resources to meet a liability obligation of \$1 billion relating to damages, and to pay a deposit of \$100 million for financial responsibility if an accidental event occurred. Equinor Canada will also provide timely issuance of Notices to Shipping if an accidental event that has occurred including the associated coordinates and undertake early and ongoing communication with commercial fishers and other industry stakeholders within the RSA.
Ongoing information sharing with Indigenous groups	Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of engagement processes will be developed through discussions with the various groups.	Section 14.1.5.3 Section 14.5	Please refer to the noted Response and EIS Reference.
In response to IR-2, the following comments, while addressed in the EIS were not noted in the engagement tables.			<p>What we heard during engagement: Mitigation measures to avoid impacts to salmon and marine mammals</p> <p>How the comment was addressed in the EIS: Refer to Section 9.1.5.2 for mitigation measures to be employed for Marine Fish and Fish Habitat, including salmon.</p>

Table 3.13 Kwilmu'kw Maw-klusuaq Negotiation Office (KMKNO) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			Refer to Section 11.1.5.2 for mitigation measures employed for Marine Mammals and Sea Turtles.

Table 3.19 Mi'gmawe'l Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Marine Protected Areas and potential interaction with the Project	Marine Protected Areas and other Special Areas in the RSA are described in Chapter 6. The potential effects of the Project upon Special Areas are identified and assessed in Chapters 12 and 16.	Section 6.4.2.2 Section 12.2 Section 16.7.7 Section 12.3	Please refer to the noted Response and EIS Reference.
Marine Mammals – potential impacts on right whales, with emphasis on ship strikes	The potential impacts of the Project upon marine mammals, including right whales, are identified and assessed in Chapter 11. It is the opinion of Equinor Canada that the likelihood of ship strikes of right whales is low due to the projected low volume and frequency of Project-related vessel traffic. Furthermore, the vessel traffic corridor is not within specific areas that have been identified as marine mammal breeding grounds, feeding concentrations, and/or migration routes Consistent with International Regulations for Preventing Collisions at Sea, 1972 with Canadian Modifications, Rule 5, every vessel shall maintain a proper lookout at all times. Project vessels will alter course and/or reduce speed if a marine mammal(s) (or sea turtle) is detected ahead of the vessel. While it is highly unlikely that surface active groups of North Atlantic right whales will occur along the vessel traffic route to the Project Area, if one is detected by	Section 11.5.3 Section 11.1.5.1 Section 11.3.1.1 Section 11.3.4.1 Section 11.3.5.1 Section 11.4.5.1	Please refer to the noted Response and EIS Reference.

Table 3.19 Mi'gmawe'I Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	Project vessel crew, the sighting(s) will be reported to DFO.		
Fish and Fish Habitat – potential impact on salmon migrating through/overwintering in Project Area	As a result of its ongoing engagement activities, including the Indigenous Knowledge Desktop Study, Equinor Canada is aware of the traditional, social and cultural importance of salmon to Indigenous groups. Equinor Canada has identified and assessed the potential impacts of the Project upon the various Atlantic salmon populations, including those which may migrate through or overwinter in the Project Area. As stated in the EIS, it is Equinor Canada's conclusion that the potential for interactions with the relevant salmon populations and the Project is limited. While the Project may result in limited localized interactions with individual salmon, it is not predicted to have overall ecological or population-level effects and will not result in a detectable decline in overall abundance or changes in the spatial and temporal distribution of salmon populations in the area. Baseline information on various salmon populations is contained in Chapter 6 and the potential effects of the Project upon these populations is identified and assessed in Chapter 9. Effects of accidents and spills upon marine fish and fish habitat, including salmon are discussed in Chapter 16. The cultural and traditional significance of salmon to Indigenous peoples is described in Chapter 7 and potential indirect effects upon Indigenous peoples resulting from direct effects to salmon are identified and assessed in Chapter 14.	Section 9.5.5 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4	Please refer to the noted Response and EIS Reference.
Environmental Effects Monitoring – scope and nature	Detailed information respecting follow-up and monitoring programs is contained in Chapter 18 of the EIS. The design of follow-up monitoring programs will be undertaken following finalization of Project design, taking	Section 18.4	Please refer to the noted response for general information on the Monitoring and Follow-up Program. Updated references in EIS

Table 3.19 Mi'gmawe'I Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>into account Agency guidance, the terms of the EIS Decision Statement and relevant regulatory requirements.</p> <p>The follow-up monitoring program will be developed in consultation with the C-NLOPB and relevant government departments (e.g., DFO, ECCC). In addition, Indigenous groups and key stakeholders will be engaged, as appropriate. Preliminary discussions with Indigenous groups respecting proposed monitoring measures were held at 3 Workshops in October and Indigenous groups which did not participate in person were invited to provide comments in writing.</p> <p>The scope of such programs will take into consideration the results of other offshore environmental effects monitoring programs (both previous and ongoing), employ technology specifically suited to the monitoring of a production project at 1200 m water depths and utilize Equinor's global experience in EEM, ongoing research and new technologies.</p>		<p>Significance tables at end of each chapter identify where follow-up monitoring is proposed for each effect.</p> <p>Table 9.18/19 Marine Fish and Fish Habitat 10.7/8 Marine and Migratory Birds Table 11.9/10 Marine Mammals and Sea Turtles Table 12.7/8 Special Areas Table 13.7/8 Commercial Fisheries and Other Ocean Uses Table 14.6/7 Indigenous Peoples</p> <p>Section 18.4.2 provides an overview of follow-up monitoring for the Project. Monitoring plans are subject to engagement with Indigenous groups and key stakeholders, as appropriate.</p>
Indigenous Engagement	<p>Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of engagement processes will be developed through discussions with the various groups.</p>	<p>Section 14.1.5.3 Section 14.5</p>	<p>Please refer to the noted Response and EIS Reference.</p>
Decommissioning – seabed infrastructure	<p>As stated in Section 9.2.6.2 of the EIS, there are two options for decommissioning of subsea infrastructure – leave the infrastructure in place or removal of the infrastructure. The effects of each alternative are described in Section 9.2.6.2 of the EIS.</p>	<p>Section 9.3.6 Section 9.4.6</p>	<p>Please refer to the noted Response and EIS Reference.</p>
Effects of Environment on	<p>In accordance with the Newfoundland Offshore Certificate of Fitness Regulations, the FPSO and drilling</p>	<p>Section 17.3.2</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.19 Mi'gmawe'I Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Project – disconnection in rough weather	installation(s) are required to have a Certificate of Fitness, which requires that the installation be designed with potential environmental loads imposed by earthquakes and other naturally occurring phenomena being taken into account. The FPSO and/or drilling installation(s) are capable of disconnection in a short period of time, if necessary. Effects of the environment on the Project are assessed in Chapter 17.		
Produced Water – level of hydrocarbons and dispersion area	Equinor Canada has modelled the dispersion of produced water and the identification and assessment of effects is contained in chapter 9. Appendix J provides the complete produced water modelling report. Modelling was based upon a worst-case scenario (produced water with a residual oil-in-water content of 30 mg/l). The effects assessment of produced water includes the effects of residual oil and other contaminants in treated produced water, effects of discharging high temperature water, and discharging water with higher salinity. Using the results of the modelling, the ZOI for produced water would be confined to within 100 m of the location of the FPSO.	Section 9.3.2.4 Section 9.4.2.1 Appendix J	Please refer to the noted Response and EIS Reference.
Emergency Response – budget, procedures, minimum requirements	Equinor is committed to becoming an industry leader on safety and will comply with all regulatory standards respecting worker and environmental safety, as outlined in Chapter 1 of the EIS. Relevant legislation is listed in Chapter 1 and in addition, in accordance with the Atlantic Accord Acts and Section 6 of the Newfoundland Offshore Petroleum Drilling and Production Regulations, a Safety Plan must be approved by the C-NLOPB prior to the issuance of an Operations Authorization. Equinor Canada's spill response measures are set out in Chapter 16 and additional information on Well Intervention Response Strategies and related matters is set out in	Section 1.3 Section 16.1 Appendix N Appendix O	Please refer to the noted Response and EIS Reference.

Table 3.19 Mi'gmawé'I Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>Appendices N and O. Equinor Canada is prepared to effectively respond to an oil spill offshore and is equipped with the necessary response tools, personnel and strategies. All plans surrounding a response to accidental events are submitted to the C-NLOPB for review and approval as part of the regulatory authorizations process. Financial requirements for operators respecting liability for damages attributable to the Project are governed by Regulations passed pursuant to the Atlantic Accord Acts and the Guidelines Respecting Financial Requirements (C-NLOPB 2017).</p>		
<p>Indigenous groups – Sami in Norway and role in management of salmon resources</p>	<p>Equinor Canada supplied MTI with relevant articles respecting the role of Sami in Norway in relation to the management of salmon resources.</p>	<p>Not within the scope of the EIS Guidelines</p>	<p>Please refer to the noted Response and EIS Reference.</p>
<p>In response to IR-2, the following comments, while addressed in the EIS were not noted in the engagement tables.</p>			<p>What we heard during engagement: Potential impacts on Aboriginal and Treaty rights and interests.</p> <p>How the issue was addressed in the EIS: The cumulative effects assessment for the Indigenous Peoples VC is detailed in Section 15.7 and the residual effects predicted based on this assessment, as well as other VCs in Chapter 15 is summarized in Section 15.7.5, as follows:</p> <p>The Project will not result in residual adverse effects on</p> <ul style="list-style-type: none"> • any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance •

Table 3.19 Mi'gmawe'I Tplu'taqnn Inc. (MTI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<ul style="list-style-type: none"> • physical and cultural heritage • • the current use of lands and resources for traditional purposes <p>The Project will have no residual effects upon the exercise of Aboriginal or treaty rights</p> <p>The Project may result in residual adverse effects on commercial-communal fisheries. These residual effects are predicted to be not significant</p> <p>This prediction is made with a high level of confidence based on an understanding of the general effects on commercial fisheries in the LSA.</p> <p>With the application of proposed Project-related mitigation and environmental protection measures, the residual environmental effects on Indigenous Peoples, including health and socioeconomic conditions are predicted to be not significant.</p>

Table 3.21 Elsipogtog First Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Decommissioning – monitoring of abandoned wells	Decommissioning is discussed in depth in Chapter 2. Well abandonment will adhere to the requirements set out under the Newfoundland Offshore Petroleum Drilling and Production Regulations. Pursuant to these regulations, operators are required to provide detailed plans for monitoring suspended wells to the C-NLOPB. Operators	Section 2.6.7	Please refer to the noted Response and EIS Reference.

	are also required to provide C-NLOPB with information regarding suspension or abandonment methods designed to ensure the wells are adequately isolated, which in turn will prevent hydrocarbons from entering the environment. Financial requirements for operators respecting liability for damages attributable to the Project are governed by Regulations passed pursuant to the Atlantic Accord Acts and the Guidelines Respecting Financial Requirements (C-NLOPB 2017).		
Indigenous Engagement – form, activities, funding	Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of engagement processes will be developed through discussions with the various groups. Questions respecting capacity funding to participate in the EA process have been referred to the CEA Agency.	Section 14.1.5.3 Section 14.5	Please refer to the noted Response and EIS Reference.
Cumulative Effects – Impacts on traditional territory	Equinor Canada has identified and assessed cumulative effects using the approach described in relevant CEA Agency guidance documents by considering the impact of the Project in combination with other past, present and future activities in the region upon each VC. As is the case with the assessment of intra-Project effects, an ecosystem approach has been adopted. The results of this assessment are set out in Chapter 15 of the EIS. With respect to potential impacts on traditional territories, since the closest Indigenous community is located approximately 630 km from the Project area and since there is no overlap between the Project Area or LSA with the traditional territory of any Indigenous group, no cumulative effects on traditional territories are predicted.	Section 15.2.6 Section 15.3.6 Section 15.4.6 Section 15.5.5 Section 15.6.5 Section 15.7.5	<p>What we heard during engagement: Assessment of cumulative effects of the offshore projects on Aboriginal rights to fish for food, social and ceremonial purposes, Treaty rights including a right to fish for a moderate livelihood, and commercial communal fishing licences.</p> <p>How the comment was addressed in the EIS: The cumulative effects assessment for the Indigenous Peoples VC is detailed in Section 15.7 and the residual effects predicted based on this assessment, as well as other VCs in Chapter 15 is summarized in Section 15.7.5, as follows:</p> <p>The Project will not result in residual adverse effects on:</p> <ul style="list-style-type: none"> • any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance • physical and cultural heritage

			<ul style="list-style-type: none"> the current use of lands and resources for traditional purposes <p>The Project will have no residual effects upon the exercise of Aboriginal or treaty rights.</p> <p>The Project may result in residual adverse effects on commercial-communal fisheries. These residual effects are predicted to be not significant.</p> <p>This prediction is made with a high level of confidence based on an understanding of the general effects on commercial fisheries in the LSA.</p> <p>With the application of proposed Project-related mitigation and environmental protection measures, the residual environmental effects on Indigenous Peoples, including health and socioeconomic conditions are predicted to be not significant.</p>
<p>Species of concern – Salmon, American eel</p>	<p>Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge Desktop Study (Appendix H), Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. During its ongoing engagement, Indigenous groups have placed particular emphasis upon salmon and American eel as species of cultural importance. Information on species of either traditional or commercial importance has been incorporated into baseline information (see chapters 6 and 7). Potential effects (direct and indirect) of the Project upon fish and fish habitat and subsistence fisheries and associated mitigation measures are discussed in Chapters 9 and 14 respectively. As indicated in these chapters, no significant direct effects upon marine fish or fish habitat are predicted to result from routine Project operations and no indirect effects (health, cultural or socio-economic) associated with Indigenous uses or culture are predicted to result from routine Project activities. The effect of spills</p>	<p>Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2 Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p>	<p>Please refer to the noted Response and EIS Reference</p> <p>EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2</p> <p>EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon</p>

	<p>on fish, fish habitat and Indigenous persons are discussed in Chapter 16.</p>	<p>During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF) ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor, as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for</p>
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			2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalised.”
Indigenous Rights	Information respecting Indigenous and treaty rights is included in Chapter 7 of the EIS. It is Equinor Canada’s understanding that none of the Indigenous groups listed in the EIS Guidelines have asserted or established Indigenous rights to, in or near the lands and waters of the LSA, including the Core BdN Development Area and the Project Area. Additionally, none of the Indigenous groups has identified any current use of lands and resources for traditional purposes or other forms of traditional activities in the LSA. There is also no overlap between the traditional territory of any of the 41 Indigenous groups listed in the EIS Guidelines and the Core BdN Development Area, the Project Area, or the LSA. However, Equinor Canada will continue to engage with Indigenous groups to further understand if there are any potential adverse impacts upon Indigenous rights.	Section 7.3	Please refer to the noted Response and EIS Reference.

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Commercial Fisheries –	Equinor Canada will develop and implement a compensation program for damages experienced by commercial and communal commercial fishers which result from Project activities. The program will be	Section 7.3.8.1 Section 13.2.1.1 Section 13.3	Please refer to the noted Response and EIS Reference.

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
compensation for gear damage	developed in consideration of the C-NLOPB Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activities (2017). The proposed compensation regime is discussed in greater detail in Chapters 13 and 16.	Section 13.3.1 Section 16.7.8	
Fish and Fish Habitat – impact on salmon from routine operations and accidents	Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge Desktop Study, Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. During its ongoing engagement, Indigenous groups have placed particular emphasis upon salmon and American eel as species of cultural importance. Information on species of either traditional or commercial importance has been incorporated into baseline information (see chapters 6 and 7). Potential effects (direct and indirect) of the Project upon marine fish and fish habitat and subsistence fisheries and associated mitigation measures are discussed in Chapters 9 and 14 respectively. As indicated in these chapters, no significant direct effects upon marine fish or fish habitat or any indirect effects (cultural, social, health or socio-economic) upon Indigenous persons are predicted to result from routine Project activities. The effect of accidents and malfunctions upon marine fish and fish habitat and Indigenous persons are discussed in Chapter 16.	Section 9.4 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H	Please refer to the noted Response and EIS Reference. EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2 EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
			<p>“Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF) ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging</p>

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
			Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalised.”
Company and Operations	Details respecting Equinor’s corporate structure, experience, values and policies have been provided to Indigenous groups during ongoing engagement activities, including in a power point presentation which was transmitted to each Indigenous group and discussed at in-person meetings. Equinor Canada and its operations are fully discussed in Chapter 1 of the EIS.	Section 1.1	Please refer to the noted Response and EIS Reference.
Effect of Environment on the Project - icebergs	Chapter 17 identifies and assesses potential effects of the Environment upon the Project, including icing and icebergs. Equinor Canada will monitor installations for icing conditions and accumulation rates, as applicable. Measures to reduce icing include removal and/or melting of the ice. Equinor Canada will implement an ice management plan, which will outline ice and iceberg observations, and protocols for disconnection of the FPSO. Equinor Canada is evaluating options for iceberg detection, such as ice detection radar and use of satellite imaging data. The FPSO will be ice-strengthened and vessels and shuttle tankers will be capable of operating in ice-prone waters.	Section 17.2.3 Section 17.3.3	Please refer to the noted Response and EIS Reference.

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Project Description – Equinor’s offshore operations, number of wells, annual production levels	Details respecting Equinor’s offshore operations (international and Canadian) have been provided to Indigenous groups during ongoing engagement activities, including in a power point presentation (see Appendix G) which was transmitted to each Indigenous group and delivered at in-person meetings. Equinor Canada’s offshore operations are described in Chapter 1.	Section 1.1.1 Section 2.5.3	Please refer to the noted Response and EIS Reference. Specific EIS section references: Number of wells – Section 2.3 Annual production rate – Table 2.6, Section 2.5.3
Environmental Effects Monitoring	<p>Detailed information respecting follow-up and monitoring programs is contained in Chapter 18 of the EIS. The design of follow-up monitoring programs will be undertaken following finalization of Project design, taking into account Agency guidance, the terms of the EIS Decision Statement and relevant regulatory requirements.</p> <p>The follow-up monitoring program will be developed in consultation with the C-NLOPB and relevant government departments (e.g., DFO, ECCC). In addition, Indigenous groups and key stakeholders will be engaged, as appropriate. Preliminary discussions with Indigenous groups respecting proposed monitoring measures were held at three Workshops in October and Indigenous groups which did not participate in person were invited to provide comments in writing.</p> <p>The scope of such programs will take into consideration the results of other offshore environmental effects monitoring programs (both previous and ongoing), employ technology specifically suited to the monitoring of a production project at 1200 m water depths and utilize</p>	Section 18.4	Please refer to the noted Response and EIS Reference. Updated references in EIS Significance tables at end of each chapter identify where follow-up monitoring is proposed for each effect. Table 9.18/19 Marine Fish and Fish Habitat 10.7/8 Marine and Migratory Birds Table 11.9/10 Marine Mammals and Sea Turtles Table 12.7/8 Special Areas Table 13.7/8 Commercial Fisheries and Other Ocean Uses Table 14.6/7 Indigenous Peoples

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
	Equinor Canada’s global experience in EEM, ongoing research and new technologies.		
Produced Water and treatment of radioactive materials	Equinor Canada will treat produced water as well as other discharges using best treatment practices that are commercially available and economically feasible. A description of the proposed treatment package for produced water is provided in Section 2.7.1.5 of the EIS. All discharges will be in accordance with applicable regulatory requirements and the OWTG. Equinor Canada’s EPP will include plans for the management of waste materials generated during the Project (both hazardous and non-hazardous materials), such as oily wastes, waste chemicals and containers, domestic wastes etc. All wastes will be managed in accordance with the OWTG. The occurrence of naturally occurring radioactive material (NORM) in volumes of waste of any significance is not anticipated. If radioactive material is encountered, appropriate waste handling and management will be implemented. Waste treatment is discussed in Chapter 2.	Section 2.7.1.5 Section 2.8.4	<p>What we heard during engagement: Salinity level of produced water Cumulative effects of produced water from multiple operations</p> <p>How the issue was addressed in the EIS: Section 9.3.2.4 and Appendix J indicate that preliminary data suggest that the salinity of produced water and cooling water associated with the BdN Development Project will be very similar to seawater.</p> <p>Section 2.7.1.5 provides information related to produced water management. A three-stage water treatment process has been selected, consisting of hydrocyclones, compact floatation units and a final de-gassing drum. The oil-in-water concentration at discharge is expected to be less than the Offshore Waste Treatment Guidelines (OWTG) (NEB et al. 2010) performance target of 30 mg/L (monthly rolling average). New installations in the Norwegian Continental Shelf (NCS) are applying a best available technology assessment and risk evaluation to determine a suitable produced water management strategy (e.g., treat and discharge or reinjection) (Nesse et al. 2016). Production facilities discharging produced water on NCS achieve oil-in-water concentrations lower than 30 mg/L, and some facilities have an annual average of 15 mg/L (Nesse et al. 2016). The assessment of alternatives for management</p>

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
			<p>of produced water will be further discussed in the Development Application required under the Atlantic Accords Acts.</p> <p>Refer to Sections 15.2.2/15.2.3/15.2.4 for details regarding the consideration of produced water and cumulative effects.</p> <p>Project components and activities are not likely to result in significant residual adverse cumulative environmental effects on Marine Fish and Fish Habitat, Marine Mammals and Sea Turtles and/or Marine and Migratory Birds in combination with other projects and activities that have been or will be carried out in the RSA.</p>
Sedimentation – impact on habitat, corals and sponges	<p>Equinor Canada conducted a coral and sponge survey of the Core BdN Area in 2018. This survey is described in Chapter 6 which provides an overview of the existing biological environment within the Project and study areas, including background information on factors that may influence sponge distribution including sedimentation. Potential effects of suspended sediments and sedimentation upon the benthic habitat are identified and described in Chapters 9 and 12. The follow-up monitoring program implemented by Equinor Canada will focus upon sensitive marine environments. As the program is not yet designed, issues such as drill cuttings dispersion, sedimentation, produced water dispersion and sound emissions may be included. Details on follow-up monitoring are contained in Chapter 18.</p>	<p>Section 9.3.3.4 Section 9.4.3.4 Section 12.3.1.1 Section 12.2.3.1 Section 12.3.6.2 Section 12.4.1.1 Section 12.4.3.1 Section 12.4.6.1 Section 18.4</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Project Concept and Design – activities including vessel traffic	Details respecting Project concept and design and activities, including vessel traffic, have been provided to Indigenous groups during Equinor Canada’s ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. Chapter 2 of the EIS presents a detailed description of preliminary Project design and components.	Section 2.5	Please refer to the noted Response and EIS Reference.
Accidents and Malfunctions – potential effects and emergency response	The potential effects of accidents and malfunctions and Equinor Canada’s emergency response plans are set out in Chapter 16. Equinor Canada is committed to becoming an industry leader on safety and will comply with all regulatory standards respecting worker and environmental safety, as outlined in Chapter 1 of the EIS. A key focus is on prevention. Spill prevention will be incorporated into Project design and operations and facilities, processes and management system procedures are intended to reduce or eliminate the chance of a spill. Proper environmental operating practices will be assured through regular inspections and audits of the drilling installation and FPSO and through ongoing training of offshore workers, including specific training in oil spill prevention, reporting and response requirements, and procedures. Oil spill prevention, response, and overall preparedness approaches for the Project will be further developed and defined as the various regulatory review and approval processes move forward. Equinor Canada will develop	Section 16.1 Section 16.7 Appendix N Appendix O	Please refer to the noted Response and EIS Reference. Specifically: Section 16.1 Spill Prevention and Response Section 16.7.4 Marine Fish and Fish Habitat Section 16.7.5 Marine and Migratory Birds Section 16.7.6 Marine Mammals and Sea Turtles Section 16.7.7 Special Areas Section 16.7.8 Commercial Fisheries and Other Ocean Uses Section 16.7.9 Indigenous Peoples

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
	<p>and implement a Project Oil Spill Response Plan which will be submitted to the C-NLOPB as part of the Operations Authorization (OA) application process described in Chapter 1. Details of this plan and other emergency response measures are set out in Chapter 16 and additional information on Well Intervention Response Strategies and related matters is set out in Appendices N and O. Equinor is prepared to effectively respond to an oil spill offshore and is equipped with the necessary response tools, personnel and strategies.</p>		
Carbon Emissions	<p>Equinor strives to be an industry leader on safety and is actively shaping its portfolio to deliver high value with a low carbon footprint. Equinor’s approach to sustainability is based in part upon low carbon and reducing the CO2 footprint of its operations. An air emissions and dispersion modelling study to estimate the Project-related quantities of air contaminants and greenhouse gases and to predict associated ground-level concentrations of air contaminants in the vicinity of the Project was undertaken. A summary of study results as well as other information respecting air contaminants and greenhouse gases is presented in Chapter 8 and in the Technical Data Report for Air Quality and Greenhouse Gases in Appendix K.</p>	Chapter 8 Appendix K	Please refer to the noted Response and EIS Reference.
Flaring	<p>In accordance with Section 6(e) of the Newfoundland Offshore Petroleum Drilling and Production Regulations, Equinor Canada will submit a flaring plan to the C-NLOPB as part of the OA process. Routine flaring will not occur. Non-routine and/or safety flaring, when required, will be very short in duration (a few hours) and will occur during</p>	Section 2.7.4.7 Section 2.8.1 Section 8.5.3.1	Please refer to the noted Response and EIS Reference.

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
	initial start-up of the facility and during shut-down and start-up activities related to planned maintenance turnarounds. Estimated emissions from non-routine/safety flaring are provided EIS S. 2.8.1 and S. 8.5.		
Abandoned Wells – liability for abandoned wells	Regulations passed pursuant to the Atlantic Accord Acts and Guidelines Respecting Financial Requirements (C-NLOPB 2017) require an Operator to demonstrate that it is capable of acting in a responsible manner for the life of the proposed activity. Pursuant to the NL Offshore Petroleum Drilling and Production Regulations, a Decommissioning and Abandonment Plan based on an approved Development Plan must be submitted to C-NLOPB. The plan must consider any new regulatory requirements, best practices, or international laws or agreements to which Canada is bound that have come into force since the Development Plan was approved and a new environmental assessment may be required. Under section 9 of the C-NLOPB Guidelines Respecting Financial Responsibility, the operator must file proof of financial resources to cover the costs of abandonment, including any potential liability. Wells, once abandoned, continue to be subject to the provisions of the Atlantic Accord Acts respecting liability for losses or damages resulting from the discharge, emission or escape of oil and gas.	Not within the scope of the Guidelines	Please refer to the noted Response and EIS Reference.
Incorporation of Indigenous Knowledge	Equinor Canada has made every reasonable effort to collect and incorporate traditional Indigenous knowledge into the EIS. Equinor Canada has invited Indigenous groups to provide traditional knowledge during the course	Section 14.1.4 Section 14.1.5.2 Appendix H	Please refer to the noted Response and EIS Reference.

Table 3.23 Wolastoqey Nation of New Brunswick (WNNB) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
	of engagement and has in addition, offered to enter into agreements with various groups for the collection of Indigenous knowledge. Equinor Canada also commissioned an Indigenous Knowledge Desktop Study. Information contained in this study, together with information provided during engagement and information from other sources, has been taken into account in the development of the ecosystem approach throughout the EIS and was used to identify species of interest to Indigenous groups.		Clarification regarding how Indigenous knowledge was applied in the EIS is provided in Equinor’s response to IR-3.

Table 3.25 Woodstock First Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Project Operations and Activities – number of wells, drilling depths, project footprint	Details respecting Project operations and activities have been provided to Indigenous groups during Equinor Canada’s ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. A detailed description of Project operations and activities is contained in Chapter 2 of the EIS.	Section 2.5	Please refer to the noted Response and EIS Reference. Specific EIS Section references: Number of wells – Section 2.3 Footprint – Section 2.5.4 and 2.6.6 Drilling depths – Section 2.4

Table 3.25 Woodstock First Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Indigenous Engagement – capacity funding to participate in EA process	Questions related to the provision of capacity funding to enable Indigenous groups to participate in the environmental assessment process are referred to the CEA Agency.	Not within the scope of the Guidelines	Please refer to the noted Response and EIS Reference.
Marine Protected Areas – impact of Project	Marine Protected Areas and other Special Areas in the RSA are described in Chapter 6. The potential effects of the Project upon Special Areas are identified and assessed in Chapter 12.	Section 12.2 Section 12.3	Please refer to the noted Response and EIS Reference.
Spills and impacts on traditional waters	Accidents and malfunctions are discussed in Chapter 16. Spill modelling of a representative range of worst-case scenarios was conducted for the Project, including unmitigated subsurface blowouts at two locations in the Project Area (the worst-case scenario with between a one in 207,000,000 to one in 414,000,000 chance of occurrence). It is Equinor Canada’s conclusion that even in such a worst-case scenario (without the application of mitigation and response measures) given prevailing currents there is only a very low probability that a very small amount of oil (less than 1% of released oil) would make shoreline contact to the west of the Project Area. Most of that contact is predicted to occur on the Avalon Peninsula and localized areas of the Burin Peninsula. No contact with the traditional waters of any Indigenous group is predicted.	Section 16.7.9	Please refer to the noted Response and EIS Reference.

Table 3.25 Woodstock First Nation Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EA
Impact on Corals and Sponges	<p>The function and ecological role of corals and sponges, including habitat, is discussed in chapter 6. Chapter 9 provides an effects assessment of project activities on Marine Fish and Fish Habitat, including corals and sponges. The relationship between corals and sponges and EBSAs, SBAs and VMEs is described in Section 12.2 of the EIS. Chapter 16 assesses the effects of accidents and malfunctions, including the effects of an unmitigated subsurface blowout on Marine Fish and Fish Habitat, including corals and sponges. Recognizing the important role played by corals and sponges in the marine ecosystem, Equinor Canada has completed a seabed survey (detailed in Section 6.1.1.5) to provide a better dataset for assessing coral and sponge densities in the Project Area. Upon completion of final subsea layout design, the area occupied by the final layout design will be compared against the layout used in the 2018 survey. Based on the final design, if there are areas where subsea infrastructure will be installed on the seafloor that were not captured by the 2018 survey, these areas will be surveyed to collect coral, sponge and/or sea pens data.</p>	<p>Section 9.3.3.4 Section 9.4.3.4 Section 12.3.1.1 Section 12.3.3.1 Section 12.2.4 Section 12.3.6.1 Section 12.4.1.1 Section 12.4.3.1 Section 12.4.4 Section 12.4.6.1 Section 16.7.4</p>	<p>In addition to the Sections indicated, please refer to Appendix O, Fish Habitat Characterization, Mitigation and Fisheries Act Compliance Overview (Wood 2020).</p>

Table 3.27 Peskotomuhkati Nation at Skutik (Passamaquoddy) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
<p>Direct and indirect impacts of spills on Marine Species of traditional / commercial importance – herring, gaspereau, mackerel</p>	<p>Through its ongoing engagement activities as well as information contained in the Indigenous Knowledge desktop study, Equinor Canada is aware of the social, cultural, traditional and economic importance of marine fish and fish habitat to Indigenous groups. Information on species of either traditional or commercial importance such as herring, gaspereau and mackerel has been incorporated into baseline information (see chapters 6 and 7). Potential effects (direct and indirect) of the Project upon fish and fish habitat, commercial fisheries and subsistence fisheries and associated mitigation measures are discussed in Chapters 9, 13 and 14 respectively. Potential cumulative effects upon fish and fish habitat are identified and assessed in Chapter 15 and the potential impact of spills upon both commercial and subsistence fisheries is discussed in Chapter 16.</p>	<p>Section 14.2.4.1 Section 16.7.4 Section 16.7.8 Section 16.7.9</p>	<p>What we heard during engagement: Impacts to fish and fish habitat that support the traditional/commercial fishery</p> <p>How the issue was addressed in the EIS: In addition to the Sections indicated, the following specific information from the EIA is relevant.</p> <p>The research related to hydrocarbon spill effects on fish and fish habitat is detailed in Section 16.7.4. In consideration of the known effects of spills on Fish and Fish Habitat, the results of spill modelling exercises, and with the implementation of mitigation measures, it is predicted that the accidental events associated with the Project will not result in significant residual adverse effects on Marine Fish and Fish Habitat.</p> <p>See Section 16.7.8.2 for research related to fish and food chain contamination.</p> <p>The effects to commercial fisheries are addressed in Section 16.7.8. and effects to Indigenous commercial-communal fisheries are considered in Section 16.7.9.4. A subsurface blowout may interact directly and indirectly with commercial-communal fishers. Depending on the size, nature and timing of the subsurface blowout, regulatory authorities may issue temporary closures of fish harvesting in the immediate vicinity of the spill location. There is a potential for actual or perceived fish</p>

Table 3.27 Peskotomuhkati Nation at Skutik (Passamaquoddy) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>tainting from a subsurface blowout and this may affect marketability of affected commercial species. There could be loss of access to fishing areas, resulting in potential economic loss. If fishing were occurring at the time of the spill, gear and/or equipment may be fouled. The potential interaction of a subsurface blowout and commercial fisheries is discussed in Section 16.7.8 and the identification and assessment of potential effects, both direct and indirect, is equally applicable to commercial-communal fishers. With the implementation of response and mitigation measures, the magnitude and geographic extent of a subsurface blowout would be reduced. The issuance of Navigational Warnings and other communications will provide timely notice of closure areas for fishers to make alternate plans, thereby likely reducing effects on commercial-communal harvesting success. Avoidance will also reduce potential gear/vessel fouling and the likelihood of any tainted product entering the marketplace. A compensation program, as outlined in Section 16.7.8, will be implemented. The residual effects of a subsurface blowout on commercial-communal fisheries are predicted to be adverse, low in magnitude, medium-term in duration, with a geographic extent greater within the RSA, not likely to occur and reversible in nature.</p>

Table 3.27 Peskotomuhkati Nation at Skutik (Passamaquoddy) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Marine Mammals – right whales, harbour porpoises – ship strikes	The potential impacts of the project upon marine mammals, including right whales, are identified and assessed in Chapter 11. It is Equinor Canada’s assessment that the likelihood of ship strikes of right whales is low due to the projected low volume and frequency of Project-related vessel traffic. Furthermore, the vessel traffic corridor is not within specific areas that have been identified as marine mammal breeding grounds, feeding concentrations, and/or migration routes. Consistent with International Regulations for Preventing Collisions at Sea, 1972 with Canadian Modifications, Rule 5, every vessel shall maintain a proper lookout at all times. Project vessel will alter course and/or reduce speed if a marine mammal(s) (or sea turtle) is detected ahead of the vessel. While it is highly unlikely that surface active groups of North Atlantic right whales will occur along the vessel traffic route to the Project Area, if one is detected by Project vessel crew, the sighting(s) will be reported immediately to DFO.	Section 11.5.2 Section 11.1.5.1 Section 11.3.1.1 Section 11.3.4.1 Section 11.3.5.1 Section 11.4.4.1	Please refer to the noted Response and EIS Reference.
Standards for oil transport/loading	Oil transport and loading is described in Chapter 2. The Project is located approximately 500 km offshore from St. John’s. Crude oil will be offloaded from the production installation to shuttle tankers. Production operations offshore NL utilize the Basin Wide Terminal and Transshipment System (BWTTS) which is a fleet of modern shuttle tankers that ships crude to an existing	Section 2.6.4.4	Please refer to the noted Response and EIS Reference.

Table 3.27 Peskotomuhkati Nation at Skutik (Passamaquoddy) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	transshipment terminal in NL or direct to market. The shuttle tankers are subject to international maritime requirements (i.e., International Maritime Organization or IMO) and must adhere to the regulatory framework of the IMO as well as those of the vessel's flag state.		

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Applicable Regulatory Regime – role of C-NLOPB	Information on the applicable regulatory regime, including the role of the C-NLOPB, is contained in Chapter 1.	Section 1.3.2	Please refer to the noted Response and EIS Reference.
Project Description – location, components and activities	Details respecting Project location, components and activities have been provided to Indigenous groups during Equinor Canada's ongoing engagement activities. In addition, Project details were summarized in a power point presentation which was provided to each Indigenous Group and discussed at in-person meetings (see Appendix G). Three Workshops were held in October 2018 at which a Project update was presented. A detailed description of Project location, components and activities is contained in Chapter 2 of the EIS.	Section 2.4 Section 2.5 Section 2.6	<p>What we heard during engagement: Produced water treatment</p> <p>How the comment was addressed in the EIS: Section 2.7.1.5 provides information related to produced water management. A three-stage water treatment process has been selected, consisting of hydrocyclones, compact floatation units and a final de-gassing drum. The oil-in-water concentration at discharge is expected to be less than the Offshore Waste Treatment Guidelines (OWTG) (NEB et al. 2010) performance target of 30 mg/L (monthly rolling average). New installations in the Norwegian Continental Shelf (NCS) are applying a best available technology assessment</p>

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>and risk evaluation to determine a suitable produced water management strategy (e.g., treat and discharge or reinjection) (Nesse et al. 2016). Production facilities discharging produced water on NCS achieve oil-in-water concentrations lower than 30 mg/L, and some facilities have an annual average of 15 mg/L (Nesse et al. 2016). The assessment of alternatives for management of produced water will be further discussed in the Development Application required under the Atlantic Accords Acts.</p> <p>Section 14.2.2.2 summarizes potential effects related to marine discharges and concludes that disturbances to fish species from discharges and emissions will be localized at any one location. It is therefore unlikely that marine resources will be affected by discharges and emissions from the FPSO in a manner and to a degree that would translate into effects on the overall availability or quality of a marine resource, and thus, on the overall nature, intensity, or economic value of commercial-communal fishing. It was concluded in Chapter 9, that as there is no interaction associated with these discharges and emissions on marine fish species, there is no interaction with commercial-communal fisheries.</p>
Spills and Safety Record	The potential effects of accidents and malfunctions and Equinor Canada's emergency response plans are set out in Chapter 16. Equinor Canada is	Section 16.1 Section 16.3	Please refer to the noted Response and EIS Reference.

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>committed to becoming an industry leader on safety and will comply with all regulatory standards respecting worker and environmental safety, as outlined in Chapter 1 of the EIS. A key focus is on prevention. Spill prevention will be incorporated into Project design and operations and facilities, processes and management system procedures in order to reduce or eliminate the chance of a spill. Proper environmental operating practices will be assured through regular inspections and audits of the drilling installation and FPSO and through ongoing training of offshore workers, including specific training in oil spill prevention, reporting and response requirements, and procedures. Oil spill prevention, response, and overall preparedness approaches for the Project will be further developed and defined as the various regulatory review and approval processes move forward. Equinor Canada will develop and implement a Project Oil Spill Response Plan which will be submitted to the C-NLOPB as part of the Operations Authorization (OA) application process described in Chapter 1. Details of this plan and other emergency response measures are set out in Chapter 16 and additional information on Well Intervention Response Strategies and related matters is set out in Appendices N and O. Equinor Canada is prepared to effectively respond to an oil spill offshore</p>	<p>Appendix N Appendix O</p>	

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	and is equipped with the necessary response tools, personnel and strategies.		
Spill trajectory / modelling	Accidents and malfunctions are discussed in Chapter 16. Spill modelling of a representative range of unmitigated worst-case scenarios was conducted for the Project, (the worst-case subsurface blowout scenario with between a one in 207,000,000 to one in 414,000,000 chance of occurrence). It is Equinor Canada's conclusion that even in such a worst-case scenario (without the application of mitigation and response measures) given prevailing currents there is only a very low probability that a very small amount of oil (less than 1% of released oil) would make shoreline contact to the west of the Project Area. Most of that contact is predicted to occur on the Avalon Peninsula and localized areas of the Burin Peninsula. No contact with the traditional waters of any Indigenous group is predicted.	Section 16.4	Please refer to the noted Response and EIS Reference.
Offloading and Transport of Oil	Oil transport and loading is described in Chapter 2. The Project is located approximately 500 km offshore from St. John's. Crude oil will be offloaded from the production installation to shuttle tankers. Production operations offshore NL utilize the Basin Wide Terminal and Transshipment System (BWTTS) which is a fleet of modern shuttle tankers that ships crude to an existing transshipment terminal in NL or direct to	Section 2.1	Please refer to the noted Response and EIS Reference.

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	market. The shuttle tankers are subject to international maritime requirements (i.e., International Maritime Organization or IMO) and must adhere to the regulatory framework of the IMO as well as those of its flag state.		
Air Emissions - modelling	To support the regulatory review of the Project, an air emissions and dispersion modelling study was conducted. The purpose of the study was to estimate the Project-related quantities of air contaminants and greenhouse gases (GHGs) released to the atmosphere and to predict associated ground-level concentrations of air contaminants in the vicinity of the Project. A summary of study results as well as other information respecting air contaminants and greenhouse gases is presented in Chapter 8 and in the Technical Data Report for Air Quality and Greenhouse Gases in Appendix K.	Section 8.5.1.1 Section 8.5.2.1 Section 8.5.3.1 Section 8.5.4 Section 8.6.1 Appendix K	Please refer to the noted Response and EIS Reference.
Impacts on salmon – species of traditional importance	Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. In particular, Indigenous groups have emphasized the traditional cultural importance of salmon during Equinor Canada's ongoing engagement activities. Salmon is also a species of concern identified in the Indigenous Knowledge Desktop Study. Information on the various uses of salmon and other species of concern	Section 14.1.5 Section 16.7.4 Section 16.7.9 Appendix H	Please refer to the noted Response and EIS Reference. EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2 EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>by Indigenous peoples has been incorporated into Chapter 7. Potential direct effects of the Project upon fish and fish habitat, including salmon, resulting from routine Project activities are identified and assessed in Chapter 9 and potential effects resulting from accidents and malfunctions are identified and assessed in Chapter 16. Associated indirect effects upon Indigenous people (subsistence fishing, health, socio-economic and cultural effects) related to potential direct effects upon salmon are identified and assessed in Chapters 14 and 16. These chapters conclude that no significant direct effects upon marine fish or fish habitat or indirect effects (health, cultural or socio-economic) upon Indigenous peoples are predicted to result from routine Project activities.</p>		<p>Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>“Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p>

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF) ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor, as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalised.”</p>
Application of Mitigation Measures	Each VC chapter contains VC-specific mitigation measures which are summarized in Chapter 18. Mitigation measures provided in the EIS are derived from regulations, regulatory guidelines and industry best practices, and in particular instances, developed specifically for the BdN Development. Mitigations are	Section 18.2	Please refer to the noted Response and EIS Reference. Specifically, Table 18.2 lists all mitigations noted in the EIS and each VC chapter provides list of mitigations applicable to that VC (e.g., Section 9.1.5.2, 10.1.5.2, etc.)

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>designed to reduce adverse impacts upon marine ecosystems, including vulnerable marine ecosystems. These mitigation measures have been implemented offshore Newfoundland, including deep waters such as the Orphan Basin, in previous exploration drilling programs and ongoing development projects. In addition, potential mitigation measures have been discussed with various Indigenous groups during three Workshops which were held in 2018.</p> <p>Equinor Canada and its contractors will comply with all applicable mitigation measures which will be implemented and tracked in accordance with Equinor Canada's existing policies and procedures. Mitigation measures will be integrated into the Project's Environmental Protection Plan (EPP) which will be submitted to the C-NLOPB as part of the Operations Authorization process. An Environmental Effects Monitoring (EEM) program will be developed, intended, in part, to monitor the effectiveness of mitigation measures.</p>		
<p>Indigenous Engagement – Capacity Funding</p>	<p>Equinor Canada is committed to continuing to provide opportunities to Indigenous groups for information-sharing and exchange as requested or required in the post-EIS period in order to discuss issues and concerns. The specifics of engagement processes will be developed through discussions with the</p>	<p>Not within the scope of the EIS Guidelines</p>	<p>Please refer to the noted Response and EIS Reference.</p>

Table 3.29 Mi'kmaq Confederacy of Prince Edward Island (MCPEI) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	various groups. Questions related to the provision of capacity funding to enable Indigenous groups to participate in the environmental assessment process are referred to the CEA Agency.		

Table 3.31 Mi'gmawei Mawiomi Secretariat (MMS) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Impacts on Salmon and other species of cultural significance	Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. In particular, Indigenous groups have emphasized the traditional cultural importance of salmon during Equinor Canada's ongoing engagement activities. Salmon is also a species of concern identified in the Indigenous Knowledge Desktop Study. Information on the various uses of salmon and other species of concern by Indigenous peoples has been incorporated into Chapter 7. Potential direct effects of the Project upon fish and fish habitat, including salmon, resulting from routine Project activities are identified and assessed in Chapter 9 and potential effects resulting from accidents and malfunctions are identified and assessed in Chapter 16. Associated indirect effects upon Indigenous people (subsistence fishing, health,	Section 14.1.5.1 Section 13.1.5.2 Section 16.7.4 Section 16.7.9 Appendix H	Please refer to the noted Response and EIS Reference. What we heard during engagement: Assessment of cumulative effects of the offshore projects on Aboriginal rights to fish for food, social and ceremonial purposes, Treaty rights including a right to fish for a moderate livelihood, and commercial communal fishing licences. Impacts on Fish and Fish Habitat How the comment was addressed in the EA: The cumulative effects assessment for the Indigenous Peoples VC is detailed in Section 15.7 and the residual effects predicted based on this assessment, as well as other VCs in Chapter 15 is summarized in Section 15.7.5, as follows: The Project will not result in residual adverse effects on:

Table 3.31 Mi'gmawei Mawiomi Secretariat (MMS) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>socio-economic and cultural effects) related to potential direct effects upon salmon are identified and assessed in Chapters 14 and 16. These chapters conclude that no significant direct effects upon marine fish or fish habitat or indirect effects (health, cultural or socio-economic) upon Indigenous peoples are predicted to result from routine Project activities.</p>		<ul style="list-style-type: none"> • any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance • physical and cultural heritage • the current use of lands and resources for traditional purposes <p>The Project will have no residual effects upon the exercise of Aboriginal or treaty rights.</p> <p>The Project may result in residual adverse effects on commercial-communal fisheries. These residual effects are predicted to be not significant.</p> <p>This prediction is made with a high level of confidence based on an understanding of the general effects on commercial fisheries in the LSA.</p> <p>With the application of proposed Project-related mitigation and environmental protection measures, the residual environmental effects on Indigenous Peoples, including health and socioeconomic conditions are predicted to be not significant.</p> <p>Fish and Fish Habitat</p> <p>The research related to hydrocarbon spill effects on fish and fish habitat is detailed in Section 16.7.4. In consideration of the known effects of spills on Fish and Fish Habitat, the results of spill modelling exercises, and with the implementation of mitigation measures, it is</p>

Table 3.31 Mi'gmawei Mawiomi Secretariat (MMS) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>predicted that the accidental events associated with the Project will not result in significant residual adverse effects on Marine Fish and Fish Habitat.</p> <p>EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2</p> <p>EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>“Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF)</p>

Table 3.31 Mi'gmawei Mawiomi Secretariat (MMS) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation's (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF)</p> <p>ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor, as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including</p>

Table 3.31 Mi'gmawei Mawiomi Secretariat (MMS) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalised.”
In response to IR-2, the following comments, while addressed in the EIS were not noted in the engagement tables.			<p>What we heard during engagement: Detail of underwater ecosystems that will be affected</p> <p>How the comment was addressed in the EIS: Refer to the following Sections for summaries of the relevant ecosystems:</p> <p>Section 9.2 Marine Fish and Fish Habitat Section 10.2 Marine and Migratory Birds Section 11.2 Marine Mammals and Sea Turtles</p>

Table 3.33 Les Innus de Ekuanitshit (Innu First Nation of Ekuanitshit) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
Impacts on Salmon and other species of cultural importance	Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. In particular, Indigenous groups have emphasized the traditional cultural importance of salmon during Equinor Canada's ongoing engagement activities. Salmon is also a species of concern identified in the Indigenous	Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4 Section 16.7.9 Appendix H	Please refer to the noted Response and EIS Reference. EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2

Table 3.33 Les Innus de Ekuanitshit (Innu First Nation of Ekuanitshit) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
	<p>Knowledge Desktop Study. Information on the various uses of salmon and other species of concern by Indigenous peoples has been incorporated into Chapter 7. Potential direct effects of the Project upon fish and fish habitat, including salmon, resulting from routine Project activities are identified and assessed in Chapter 9 and potential effects resulting from accidents and malfunctions are identified and assessed in Chapter 16. Associated indirect effects upon Indigenous people (subsistence fishing, health, socio-economic and cultural effects) related to potential direct effects upon salmon are identified and assessed in Chapters 14 and 16. These chapters conclude that no significant direct effects upon marine fish or fish habitat or indirect effects (health, cultural or socio-economic) upon Indigenous peoples are predicted to result from routine Project activities.</p>		<p>EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>“Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This</p>

Table 3.33 Les Innus de Ekuanitshit (Innu First Nation of Ekuanitshit) Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF) ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released by ESRF on this program when agreements are finalized.”</p>

Table 3.35 Première Nation des Innus de Nutashkuan Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
<p>Impacts on Salmon and other species of cultural importance</p>	<p>Equinor Canada is aware of the social, cultural, traditional and economic importance of fish and fish habitat to Indigenous groups. In particular, Indigenous groups have emphasized the traditional cultural importance of salmon during Equinor Canada's ongoing engagement activities. Salmon is also a species of concern identified in the Indigenous Knowledge Desktop Study. Information on the various uses of salmon and other species of concern by Indigenous peoples has been incorporated into Chapter 7. Potential direct effects of the Project upon fish and fish habitat, including salmon, resulting from routine Project activities are identified and assessed in Chapter 9 and potential effects resulting from accidents and malfunctions are identified and assessed in Chapter 16. Associated indirect effects upon Indigenous people (subsistence fishing, health, socio-economic and cultural effects) related to potential direct effects upon salmon are identified and assessed in Chapters 14 and 16. These chapters conclude that no significant direct effects upon marine fish or fish habitat or indirect effects (health, cultural or socio-economic) upon Indigenous peoples are predicted to result from routine Project activities.</p>	<p>Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4 Section 16.7.9 Appendix H</p>	<p>Please refer to the noted Response and EIS Reference.</p> <p>EIS sections where the presence of Atlantic salmon is addressed: Section 6.1.9.2 Section 6.1.9.6 Section 7.3.8.2</p> <p>EIS Sections where impacts of project activities on Atlantic salmon are addressed: Section 9.5.5 Section 9.5.6 Section 14.1.5.1 Section 14.1.5.2 Section 16.7.4.3 Section 16.7.9.3 Appendix H</p> <p>Research initiatives on Atlantic Salmon During engagement activities we provided updates, where available, regarding ASF Atlantic salmon tagging program. Most recently Equinor sent an email to Indigenous groups regarding updates on Atlantic salmon research initiatives. The contents of the email are as follows:</p> <p>“Atlantic Salmon Tagging Study – Atlantic Salmon Federation (ASF) As indicated in the Bay du Nord EIS and in our engagement sessions, Equinor Canada supported the Atlantic Salmon Federation’s (ASF) salmon tagging program in 2018/2019 and intends to do the same for</p>

Table 3.35 Première Nation des Innus de Nutashkuan Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			<p>the 2021 program. Equinor provided funding for acoustic salmon tags to ASF for use in their tagging program off Greenland. We recently received a summary of the results from ASF, which provides information on the status of that program along with some preliminary information from their salmon tagging initiatives. This information was emailed to Indigenous Groups on November 23.</p> <p>Atlantic Salmon research under Environmental Studies Research Fund (ESRF) ESRF is a research program that sponsors environmental and social studies pertaining to offshore petroleum activities. Equinor as an Operator offshore Newfoundland, pays levies to fund ESRF. Atlantic salmon has been identified by the ESRF management board as one of their priority areas for research over the next few years, based on feedback received from your communities and groups during engagement on offshore oil and gas projects. ESRF will support a multi-year, multi-partner research program with a goal to improving the understanding of the migratory patterns of Atlantic Salmon. Due to COVID restrictions, plans for 2020 were delayed. Near term plans include tagging Atlantic salmon in river systems in Atlantic Canada (including some rivers in Eastern Quebec). The study will also support the ongoing work by ASF in their tagging studies offshore Greenland. It is our understanding that further information will be released</p>

Table 3.35 Première Nation des Innus de Nutashkuan Issues and Concerns

Key Issues and Questions Raised	Response	EIS Reference	Public Review IR-2 / KMKNO_03, 04 Response Clarification of IG comments and their incorporation into the EIS
			by ESRF on this program when agreements are finalized.”

<p>Public Review IR-3 KMKNO-09; MTI-01; KMKNO-06</p>	<p>Guideline Ref: Part 5 (Part 1)</p>	<p>EIS Ref: Section 3.0, Subsection 3.3.2</p>
<p>Context/Rationale</p>	<p>The EIS guidelines require Equinor to explain what Indigenous knowledge was obtained (unless confidential), including how and where this knowledge has been integrated into the EIS.</p> <p>Several Indigenous groups indicated that it is not evident if and where primary sources of Indigenous knowledge were collected and incorporated in the effects analyses.</p> <p>The Agency requires this information to determine whether Indigenous knowledge made available has been considered in the proponent’s effects analyses and to confirm that any predicted effects or impacts to Indigenous peoples have been mitigated to the greatest extent possible.</p>	
<p>Specific Comment</p>	<p>Describe the primary sources of Indigenous knowledge that were collected during consultation activities.</p> <p>Describe where primary sources of Indigenous knowledge have been incorporated into the EIS.</p>	
<p>Equinor Response</p>	<p>As stated in Section 7.3.1 of the EIS, the primary sources of Indigenous Knowledge (IK) gathered and used in the EIS included information collected during engagement sessions and the Mi’gmawe’l Tplu’taqnn Incorporated (MTI) IK study “Mi’gmawe’l Tplu’taqnn Incorporated Indigenous Knowledge Study for the Eastern Newfoundland Offshore Exploration Drilling Project and the Flemish Pass Exploration Drilling Project” (herein referred to as the MTI IK study). The Bay du Nord (BdN) EIS notes the sources of information used in the EIS.</p> <p><i>“A variety of existing and available data and information sources were used to understand and describe the various Indigenous groups and communities and their resource harvesting activities. These information sources include face-to-face meetings and workshops with Indigenous groups or affiliate organizations, telephone conversations, emails and letter correspondence (as described in detail in Chapter 3), publicly available land claims documentation, government documents and data, community / organization websites and traditional resource use reports and studies completed for other projects and their EAs, including an Indigenous knowledge study prepared for Equinor Canada’s Flemish Pass Exploration Drilling Program. Equinor Canada also engaged an academic researcher to provide expertise on Indigenous resource use in Atlantic Canada to supplement the information base of publicly available Indigenous knowledge relevant to the Project (Appendix H).” (Section 7.3.1)</i></p> <p>The effects analysis on species of cultural importance in environmental assessment for offshore oil and gas projects is evolving. In past environmental assessments, effects analysis for certain species were more general (e.g., assessing impacts on pelagic fish), whereas the BdN EIS and other more recent EIS reports focused the effects assessment on specific fish species (e.g., swordfish), including species not specifically included in previous effects assessments.</p> <p>For the BdN EIS, the IK collected informed the basis of the effects assessment, in terms of the biological overview of fish, marine mammal and birds species discussed in Chapter 6, and in terms of the effects analysis of Project interactions. As is currently standard in</p>	

Public Review IR-3	Guideline Ref: Part 5 (Part 1)	EIS Ref: Section 3.0, Subsection 3.3.2
KMKNO-09; MTI-01; KMKNO-06	<p>environmental assessment, the BdN effects assessment described in the EIS (i) considered the environmental components as a whole (i.e., fish, marine mammals, birds) to determine project-environment interactions, and (ii) as applicable and/or relevant to the specific interaction, focused the effects analysis on specific species, which were identified in part based on cultural importance and/or value determined from applicable IK. Specifically, the environmental effects analysis of the BdN Project assessed the potential effects of Project interactions with the valued ecological components of Marine Fish and Fish Habitat, Marine and Migratory Birds, and Marine Mammals and Sea Turtles. Using the IK collected, the effects assessment focused on those species identified through the IK by including species-specific studies and information in addition to all other relevant research with the goal to improve the understanding of potential project interactions and effects related to the species indicated via IK. For example, Swordfish was identified by Indigenous groups as having spiritual and cultural importance and based on this, studies on the effects of light emissions on swordfish were included in the effects analysis. Additionally, in the effects assessment for Project activities on Marine Fish and Fish Habitat (Chapter 9) interactions and effects from light emissions from the production installation and vessels were discussed in relation to pelagic fish species (which includes swordfish). The IK also identified Atlantic salmon, American eel, North Atlantic right whales, and migratory birds as species of importance to Indigenous peoples. Chapter 9 identifies and assesses the potential Project interactions and effects with these fish species (Atlantic salmon, American eel). Chapters 10 and 11 addresses Project interactions and effects on migratory birds and North Atlantic Right whales, respectively. Chapter 14 addresses Project interactions and effects on Indigenous Peoples.</p> <p>In preparing and drafting the EIS, while specific IK studies and sources were not cited, the information provided through IK studies and engagement activities was applied to applicable components of the effects assessment, as noted above, and identified concerns were addressed as appropriate. Upon reflection of the feedback from Indigenous groups, Equinor concurs that the EIS did not clearly state directly where specific primary sources of IK were incorporated in the effects assessment. Equinor is appreciative of the opportunity to provide the following information to supplement the document.</p> <p>The following response provides further details on how the primary IK gathered and available to Equinor influenced research and effects analysis in the EIS that was specific to species and/or valued components.</p> <p>As noted above, the primary sources of IK for the EIS were information shared in engagement sessions with Equinor and the MTI IK study. The MTI IK study was prepared in support of environmental assessments for ExxonMobil Canada and Equinor's exploratory drilling projects offshore Newfoundland and Labrador and with agreement by MTI, it was available to Equinor for use in the BdN EIS in consideration of the overlap in the effects assessment Project Areas. The MTI IK study was not appended to the BdN Development Project EIS due to confidentiality of the information provided.</p> <p>The MTI IK study and IK from engagement with Indigenous groups highlight the importance of Atlantic salmon, American eel, bluefin tuna, swordfish, North Atlantic right whales and migratory birds to these communities. These species and others identified through IK and sourced literature are listed in Table 7.20 of the EIS. Table 7.21 of the EIS</p>	

Public Review IR-3 KMKNO-09; MTI-01; KMKNO-06	Guideline Ref: Part 5 (Part 1)	EIS Ref: Section 3.0, Subsection 3.3.2
	<p>provides information on the likely occurrence of these species and others in the Project Area. The EIS effects analysis integrates those species identified by Indigenous groups as having traditional and cultural importance that are likely to occur in the Project Area. For example,</p> <p><i>“The primary species of importance to commercial-communal fisheries in NAFO subdivisions intersecting with the Project Area are swordfish and Atlantic bluefin tuna.” (Section 7.3.8.1)</i></p> <p><i>Based on available information, and as emphasized throughout engagement with Indigenous groups for this Project, two fish species (i.e., Atlantic salmon and American eel) have been identified as being of particular concern due to their importance to Indigenous groups for cultural reasons and the potential for interaction between these migratory species and Project activities.” (Section 7.3.8.2).</i></p> <p>MTI states in their IK study that <i>“salmon are one of the most important native food sources for Micmac people in Atlantic Canada”</i>. In the engagement sessions and EIS workshops, other Indigenous groups similarly identified Atlantic salmon as of particular cultural importance as noted in the applicable tables in Section 3.3.2 and Section 7.3. The effects assessment analysis for Fish and Fish Habitat in Chapter 9, as noted above, considered the interaction and potential effects from project activities on fish species in general. Where studies were available for fish species identified as important to Indigenous groups, these effects assessment focused on these studies; a few examples are provided below:</p> <p><i>“There are also examples of scientific studies that observed non-lethal injury to fishes (McCauley et al. 2000a, 2000b, 2003; Andrews et al. 2014) and invertebrates (Christian et al. 2003, 2004; Payne et al. 2015) exposed to underwater sound. Atlantic salmon and snow crab were used as experimental animals in two of these studies. Andrews et al. (2014) conducted functional genomic studies on the inner ear of juvenile Atlantic salmon following exposure to sound from seismic air sources. Captive juvenile salmon were exposed to 50 air source discharges over a period of 8 minutes under laboratory conditions, the average received peak sound pressure level being approximately 200 dB re 1 µPa. They observed various genetic changes in the ear tissues that were related to oxygen transport, the glycolytic pathway, the Krebs cycle and the electron transport chain. Their results support the potential utility of molecular biomarkers to evaluate the effect of exposure to seismic sound on fishes.” (Section 9.3.5.3)</i></p> <p><i>“While Atlantic salmon and American eel are culturally important, Indigenous groups also harvest other species within the RSA (Section 7.3). These include swordfish, bluefin tuna, Atlantic cod, turbot, Greenland halibut, and snow crab.” (Section 16.7.9.3)</i></p> <p>Bluefin tuna and Atlantic swordfish were identified by Indigenous groups as species’ of importance. For instance, the MTI IK study notes the importance of these species and their occurrence offshore NL:.</p>	

Public Review IR-3	Guideline Ref: Part 5 (Part 1)	EIS Ref: Section 3.0, Subsection 3.3.2
KMKNO-09; MTI-01; KMKNO-06		
	<p><i>“These species were fished in historical times as well as currently. The Mi’gmaq people has repeatedly expressed their connection throughout their homeland. One interview participant in particular had direct experience of fishing in the far eastern boundaries of Mi’gmaq’i...”</i> and indicated that they observed swordfish in the Flemish Pass and Grand Banks.</p> <p>As noted above, while the effects assessment for fish species addressed all fish species in general terms, based on the IK related to swordfish and Atlantic Bluefin tuna, relevant available scientific studies specific to these species were included in the effects assessment:</p> <p><i>“Swordfish and other pelagic fishes have been shown to be attracted to marine structures, including oil platforms, fish farms, and offshore wind turbines (Franks 2000; Fayram and de Risi 2007; Arechavala-Lopez et al. 2013). Swordfish may be attracted to these areas based on increased foraging opportunities and better lighting for predation (Franks 2000; Hazin et al. 2005; Hoolihan et al. 2014; Orbesen et al. 2017) and large pelagic species in the North Atlantic (e.g., tuna, swordfish, sharks) may respond similarly to the FPSO.”</i></p> <p><i>“Atlantic bluefin tuna migrate to Canadian waters in summer in search of food and move southward in the fall. The closest tuna spawning area to the Project Area is the open ocean areas east of the mid-Atlantic states of the United States, referred to as the Slope Sea (Richardson et al. 2016), which is more than 500 km from the Project Area limiting potential effects on early life history stages...Tuna and shark species are highly mobile, pelagic species that may seasonally migrate though the LSA. With the implementation of Project mitigation measures, potential adverse effects would be unlikely”</i> (Section 9.5.8).</p> <p><i>“In situ experiments indicate that salmon species can likely detect hydrocarbon concentrations about 10 percent of those shown to cause mortality, and subsequently avoid the contaminated water (Barnett et al. 1977; Weber et al. 1981; Pineiro et al. 1996; Stagg et al. 1998). Atlantic bluefin tuna, which are capable of long-distance travel (approximately 100 km / week), may be able to avoid prolonged exposure to oil (Hazen et al. 2016). Although some flatfish species have been shown to detect and avoid oiled sediments, others would still occupy the oiled area in favour of preferred substrate type (Moles et al. 1994”</i> (Section 16.7.4.3).</p> <p><i>“The effects of oil exposure on marine fish, including salmon, have principally been determined using laboratory studies with farm raised fish or caged fish that are unable to avoid oil exposure (e.g., Barnett and Toews 1977; Thomas and Rice 1987; Fraser 1992; Pineiro et al 1996; Zhou et al 1997; Stagg et al 1998; Meador et al 2006; Stieglitz et al 2016). Many of these studies showed effects on feeding, food conversion, or changes in enzyme levels based on exposure; however, returns to baseline were generally noted in 2-8 weeks (Fraser 1992; Stagg et al. 1998). It is noteworthy that many of the concentrations used in lab studies were high compared to the results of subsurface blowout modelling described above. For example, Stagg et al (1998) investigated the effects of the Braer oil spill on the Shetland Isles, Scotland. They characterized reference sites</i></p>	

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	<p>whales, as available, as well as all other value-added, relevant research related to marine mammals. For example:</p> <p><i>“Baleen whales are thought to be more sensitive to sound at low frequencies that are predominantly produced by vessels than are toothed whales (e.g., MacGillivray et al. 2014), possibly causing localized avoidance of the Project vessels. Reactions of gray and humpback whales to vessels have been studied, but there is limited information available on the reactions of right whales and orquals (e.g., fin and blue whales; fin whales are considered common in the Project Area whereas blue whales are considered rare). North Atlantic right whales (considered rare in the Project Area) can often be approached by slowly moving vessels, but swim away from vessels that approach quickly (Watkins 1986). They tend to show little responses to close passages of small steady-moving boats when mating or feeding (Mayo and Marx 1990; Gaskin 1991). The responses of North Atlantic right whales in the Bay of Fundy to ships, sounds from conspecifics, and a signal designed to alert the whales were monitored using multi-sensor acoustic recording tags (Nowacek et al. 2004). The whales reacted overtly to the signal by swimming to the surface, likely increasing rather than decreasing the risk of collision with ships. The whales reacted mildly to controlled exposure to sounds of conspecifics but showed no response to controlled sound exposure to ships as well as actual ships (Nowacek et al. 2004). North Atlantic right whales have been known to increase the source levels of their calls, shift their peak frequencies, or otherwise change their vocal behaviour in the presence of elevated ambient sound levels (e.g., Parks et al. 2007, 2011, 2012, 2016; Tenessen and Parks 2016). Rolland et al. (2012) suggested that ship sound causes stress in right whales; they showed that baseline levels of stress-related faecal hormone metabolites decreased in North Atlantic right whales with a 6-dB decrease in underwater sound from vessels.” (Section 11.3.1.1)</i></p> <p><i>“The best estimate for the Endangered North Atlantic population is 451 individuals (Pettis et al. 2017), but the population size has been declining since 2010 (Pace et al. 2017). In Atlantic Canada, North Atlantic right whales are found during summer and fall in the Bay of Fundy, on the Scotian Shelf, the Gulf of St. Lawrence and, rarely, in the waters off NL (COSEWIC 2013), although there have been recent acoustic detections in Placentia Bay and in slope waters off the south coast of NL. This species has not been detected (visually or acoustically) in or near the Project Area. As such, the potential for this SAR to interact with Project activities is considered quite low. If a right whale did occur in the Project Area it may experience minor and temporary behavioural responses to Project activities. As assessed previously, there is minimal risk of injury or mortality from Project activities. Adherence to the SOCP will reduce potential auditory injury effects of air source arrays on right whales. The potential for ship strikes is unlikely.”</i></p> <p><i>“Project-related vessel traffic has the potential to result in mortality or injury of marine mammals and sea turtles from vessel strikes. Mysticetes are known to be more vulnerable to vessel strikes than odontocetes and pinnipeds (Laist et al. 2001; Jensen and Silber 2003; Vanderlaan and Taggart 2007). All six baleen</i></p>	

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	<p><i>whale species found in the Northwest Atlantic (and in the RSA) are documented to have been struck by ships (Jensen and Silber 2003), with fin whales being the most frequently struck followed by humpback and right whales (Laist et al. 2001; Jensen and Silber 2003; Panigada et al. 2006; Douglas et al. 2008). While it is not clear why whales are unable to avoid ship strikes, even when vessels are traveling slowly, there is evidence showing that strikes may be more likely in areas where large numbers of whales congregate to feed (Panigada et al. 2006) as well as evidence that vessel sound signatures are louder from the side and stern of the vessel than from the bow (Allen et al. 2012; McKenna et al. 2012), making detection of an approaching vessel more difficult for a whale in front of the vessel.” (Section 11.3.4.1)</i></p> <p>The EIS concluded that there would be no significant effect on marine mammals, which inherently includes the marine mammal species of importance noted in the effects analysis.</p> <p><i>“It is predicted that the Project will not result in significant adverse effects on Marine Mammals and Sea Turtles. Although Project-related activities are generally predicted to result short- to long-term effects on marine mammals and possibly sea turtles in the Project Area (possibly extending to the LSA), the number of individuals that may be affected, and the reversible nature of these effects, indicates that the Project will not result in a detectable decline in overall marine mammal and sea turtle abundance or changes in the spatial and temporal distributions of marine mammal and sea turtle populations. The potential for interactions between individuals of SAR and the Project is considered limited (with the likely exception of fin whales, northern bottlenose whales, and possibly Sowerby’s beaked whales), and no identified critical habitat is present in the Project Area, LSA, or RSA. The Project is not predicted to jeopardize the overall abundance, distribution, or health of SAR. With mitigation and environmental protection measures, the residual environmental effects on Marine Mammals and Sea Turtles (including SAR) are predicted to be not significant.” (Section 11.6.3)</i></p> <p>Migratory birds were also noted as species of cultural and traditional importance to Indigenous groups through engagement sessions and the MTI IK Study. For instance, the MTI IK study noted the importance of migratory birds to Mi’gmaq; migratory birds are of direct importance for food and as indicators of where and when to fish. Additionally, the migratory birds important to the Inuit include eider, black ducks, ptarmigan, murres, and others:</p> <p><i>Migratory birds are also an important part of the Labrador Inuit harvest. The Labrador Inuit traditionally harvest eider and black ducks, ptarmigan/grouse, Canada goose, murres, mergansers, scoters and loons.” (Table 7.10, Section 7.3.2)</i></p> <p>The IK related to migratory birds informed the species information provided in the EIS and the effects assessment. This include the detailed overview of migratory birds that are likely in the Project Area, as discussed in Section 6.2., including seabirds (e.g., shearwaters, storm-petrels, gannets), alcids (dovekies, murres, Atlantic puffin), gulls and</p>	

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	<p>terns. Other species identified as important by Indigenous groups were not likely to be in the Project Area and therefore were not the focus of the assessment.</p> <p>The EIS concluded that there will not be significant effects on marine and migratory birds from routine Project activities, as noted above, these conclusions apply to all marine and migratory birds, including those noted as culturally important to Indigenous groups.</p> <p><i>“It is predicted that the Project will not result in significant adverse effects on Marine and Migratory Birds. Although Project-related components, activities and emissions may result in some localized, short- to long-term interactions with Marine and Migratory birds in parts of the LSA, the number of individuals that may be affected, and the temporary and reversible nature of these interactions, means that the Project will not have overall ecological or population-level effects and will not result in detectable decline in overall bird abundance or changes in the spatial and temporal distributions of bird populations within the RSA. This conclusion has been reached with a moderate to high level of confidence based on the nature and scope of the Project, knowledge about the existing environment within the LSA and RSA, and current understanding of the effects of similar projects on the VC and relevant, planned mitigation measures.”</i> Section 10.6.3).</p>	

Public Review IR-4 WNNB-25	Guideline Ref:	EIS Ref: VC- Marine Fish and Fish Habitat
Context/Rationale	Appendix O of the EIS only included consideration of offsetting the calculated amount of potential habitat loss from the Project’s subsea infrastructure. It is not clear to WNNB whether Equinor plans to include the potential alterations and loss of seabed habitat from the drill cuttings in the offsetting plan as described in modelling of drill waste fate and effect.	
Specific Comment	Explain if the potential alteration and loss of benthic habitat and species from drilling waste effects will be included in the offsetting plan or provide a rationale for why these areas are excluded.	
Equinor Response	Appendix O “Fish Habitat Characterization, Mitigation and Fisheries Act Compliance Overview” outlines how Equinor Canada will comply with the requirements of a Fisheries Act Authorization, should DFO determine that the authorization is required for the Project. The compliance overview document is not an offsetting plan and therefore does not provide estimates of the level of offsetting that may be required. Appendix O is complementary to the information provided in the EIS. The values provided in the EIS, including Appendix O are estimates of the potential geographic area that may be affected by the installation of subsea infrastructure (i.e., flowlines and templates) and drill cuttings deposition (based on modelling results). Once final design of the Project subsea layout is determined, Equinor Canada will commence the Fisheries Act Authorization review process pursuant to the requirements of DFO. In support of Equinor Canada’s “Request for Review” process under DFO’s Fisheries Act Authorization process, additional visual data of fish habitat will be collected once final design is complete. Based on this	

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	information DFO will determine if a Fisheries Act Authorization is required, including offsetting requirements.	