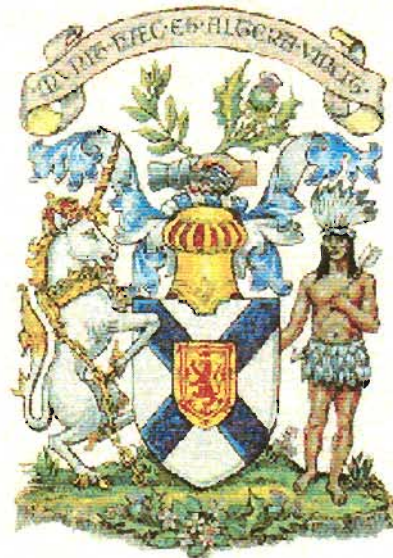


**NEWFOUNDLAND AND LABRADOR – NOVA SCOTIA**  
Case Concerning The Line Dividing Their Respective Offshore Areas

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**TERRE-NEUVE ET LABRADOR – NOUVELLE-ÉCOSSE**  
Affaire portant sur les limites de leurs zones extracôtières respectives



**NOVA SCOTIA**  
**MEMORIAL**



This case is not, in essence, about a boundary. It is about an agreement. An agreement concluded over 35 years ago among the Governments of Canada's five East Coast Provinces, in good faith. An agreement that has stood unchallenged and on which the five governments have relied since that time, to their benefit. An agreement to which, today, one of the five governments apparently claims it never agreed.

The agreement in question was concluded in 1964, and provided for the delimitation of the offshore areas of the five Provinces, including the line dividing the offshore areas of Nova Scotia and Newfoundland. The government in question is the Government of Newfoundland, which now says that it never accepted the line; the evidence, including Newfoundland's conduct over the years, says otherwise.

The line in question is not a "proposed" line, or a "purported" line, or a "Nova Scotia" line. It is **the** line, agreed to by the Governments of five Provinces in the context of a binding agreement among all regional jurisdictions. It is the **existing** line, applied in practice by Nova Scotia and Newfoundland and incorporated into federal and provincial law. It is the line that the parties to this arbitration have resolved by agreement.