

December 14th 2012

Mr. Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board

Re : Comments on the Environmental Assessment Addendum for the proposed Ptarmigan Energy Inc. Geophysical Program for Anticosti Basin Offshore Western Newfoundland and Labrador Environmental Assessment (CEAR 11-01-65302)

We have examined the response of the proponent regarding the St. Lawrence Coalition's comments on the EA report and it is not entirely satisfactory to us.

In comment no. 63 we have addressed the important negative effects that seismic sound waves could have on many species, such as fishes or marine mammals. We have also addressed possible conflicts between seismic survey vessels and the public in general, and fishermen in particular.

In his answer, the proponent has referred us to the general sections of the EA that concern seismic impacts on living organisms. However, concerning conflicts with fishermen, the proponent has not answered our comment at all.

Searching ourselves in the EA, we find in sect. 7.8 that the proponent does talk about possible conflicts with various ocean users. However, the proponent says that the seismic surveys will be held between Oct. 2012 and Jan. 2013, thus outside of the fishing season. The proponent also mentions that holding the surveys in the Oct. 2012 to Jan. 2013 time frame will avoid sensitive life stages of fish, as well as annual summer migration to the Gulf of St. Lawrence by several marine mammal and sea turtle species;

This range of survey dates is totally unrealistic. We are currently in early December 2012 and the proponent cannot receive the final authorization before at least a couple of months. It is thus impossible to do the surveys before the 2013 fishing season, before the migrations of many species, and before sensitive life stages of fishes.

Questions :

Will the proponent delay his surveys until Oct. 2013-Jan 2014 to avoid conflicts with fishermen, to avoid impacts on sensitive life stages of fishes, or to avoid impact on migrating marine mammals?

Will the proponent do the seismic surveys during the 2013 fishing season?

This is extremely important to clarify, specially considering the recent major conflict between FFAW and MKI on the Grand Banks, and the less than harmonious relation between the Nunatsiavut Government and MKI off the coast of Labrador.

We are confident that you will recognize the importance of the preceding points and see that they are being fully addressed by the proponent.

Yours truly,

Sylvain Archambault
Spokesperson
St. Lawrence Coalition
s.arch@videotron.ca
tél. (418) 686-1854
cel. (581) 995-4350

cc. E. Young
D. Burley