

Friday, 30 October 2020

235 Water St.
Suite 701
St. John's, NL
A1C 1B6
bhp.com

Impact Assessment Agency of Canada
Government of Canada
301-10 Barbers Hill
St John's, NL A1C 6M1

Email: iaac.atlanticregion-regiondelatlantique.aeic@canada.ca

As the proponent, BHP Petroleum (New Ventures) Corporation appreciates the opportunity to comment on the potential environmental assessment conditions for the BHP Canada Exploration Drilling Project. BHP is a relatively new entrant into the Newfoundland and Labrador region, having been awarded our exploration licences in early 2019. We would like to re-iterate BHP's interest in continuing to participate in discussions regarding the future of the Newfoundland offshore. We continue to progress the technical and regulatory work needed to enable commencement of offshore exploration.

We would like to focus our response on the draft conditions related to migratory bird monitoring. As part of the requirements for follow-up for migratory birds, Condition 4.4.4 states:

4.4.4 develop and implement methods for monitoring migratory bird interactions with lighting related to the Designated Project.

Our interpretation is that the monitoring of migratory bird interactions with lighting will occur as a result of other conditions associated with the Designated Project and that the development and implementation of addition monitoring in Condition 4.4.4 will be redundant.

Specifically, the monitoring requirements within Conditions 4.4.1, and 4.4.2 will determine the degree to which migratory birds are being attracted to and stranding on the vessels and MODU. Condition 4.4.3 requires monitoring of the presence of migratory birds and documentation of their behavior around the flare. Each of these conditions are effectively monitoring migratory bird interactions with lighting on the facilities.

As required, the nine mitigations outlined in Condition 4.2 to reduce the risk to birds from lighting and flaring will be in place. The monitoring requirements as part of conditions 4.4.1 and 4.4.2 are therefore assessing the effectiveness of these mitigations, which should satisfy not only Condition 4.4.4, but also Condition 4.5, which requires a contribution to research programs pertaining to the mitigation measures to reduce the attraction of migratory birds to lighting in offshore areas.

We believe that the requirement for several conditions related to migratory bird monitoring creates ambiguity and will lead to uncertainty in how these inter-related conditions are being satisfied. Thank you again for providing the opportunity to comment on the potential environmental assessment conditions for the BHP Canada Exploration Drilling Project.

Regards



Tracey Simpson

Canada Country Manager, BHP Petroleum