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Sent: April 2, 2020 10:55 AM
To: Murphy, Ian <IMurphy@cnlopb.ca>
Subject: BHP Canada EL 1157 and 1158 Seabed Survey - EA Report comments

Ian,

Environment and Climate Change Canada's Canadian Wildlife Service (ECCC-CWS) has reviewed the BHP Canada Drilling Project Seabed Survey EA Addendum and the proponent's responses to our specific comments from February 2020 and offers the following response.

Section 5.4 – Mitigations (pg. 47) (Specific Comment #1 from February 6 email)
ECCC-CWS acknowledges that the proponent has corrected the reference to the systematic search protocols, as requested.

ECCC-CWS requests that the proponent add a statement to Section 5.4 that states that the proponent will consult with ECCC-CWS in the development of vessel-specific systematic search protocols and that the searches will be undertaken by trained, experienced observers, as per the recommendations outlined in the final report of the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador. ECCC-CWS suggests the following wording (see underlined additions):

“Routine systematic searches will be conducted on the survey vessels for stranded birds by trained, experienced observers. Handling and documentation of stranded birds will follow “Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada (ECCC 2016)”. ECCC will be consulted in the development of vessel-specific systematic search protocols, in advance of their implementation.”

Section 6.2 – Accidental Events (pg. 52) (Specific Comment #2 from February 6 email)
ECCC-CWS acknowledges that the proponent has added a statement to the accidental events section regarding the timing and location of spills and potential change in the magnitude of effects, as requested. No further comments at this time.

Section 6.4 – Cumulative Environmental Effects (pg. 53)
The proponent has added the following statement to the cumulative effects section, related to marine and migratory birds:
“Operation of the survey vessel will result in a temporary, localized increase in artificial lighting in the marine environment. Potential cumulative adverse effects on marine and/or migratory birds include attraction to artificial lighting, which may cause an increase in predation (Weise et al. 2001; Ronconi et al. 2015). The presence of the survey vessel, along with the presence of vessels in the area for other reasons (e.g., other oil and gas activities, fishing, shipping), has the potential to cause a decrease in accessibility for marine and/or migratory birds to foraging grounds. While the 24-hour per day operation of the survey may result in an increase in

attraction to the survey vessel, the limited temporal scope is not expected to result in long-term cumulative effects to marine and/or migratory birds.”

ECCC-CWS acknowledges that the proponent has added additional details to the cumulative effects section, as requested, but further information/clarification is required.

ECCC-CWS requests that the proponent provide additional information and/or clarification in the section related to cumulative effects on marine and migratory birds, as follows:

- * Additional information related to the potential impacts of attraction to artificial lighting, which are not limited to increased predation (as stated) but can also result in strandings that can lead to oiling and/or mortality, unnecessary energy expenditure while circling, etc.

- * Clarification on how the presence of vessels can decrease accessibility to foraging grounds – the proponent should expand on this with additional information and references to support the statement.

My apologies for our response being delayed. Please contact me if you have any questions.

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