

bp Canada Energy Group ULC 2023 Amendment  
2023 EA Amendment

Reviewed by: C-NLOPB, DFO, NL FFA, FFAW, ECCC and DND  
03/28/2023

Number	Reviewer	Section	Comment	bp Response
	C-NLOPB	<b>2.3.3 Seabed Monitoring and Sampling</b>	Please clarify why the multicorer, deployed from the vessel, is unlikely to have a camera setup.	
	DFO	<b>MPC General Comment</b>	DFO has assessed the additional activities outlined in EA Amendment and determined they are likely to pose a low risk. These activities include collection of sediment push cores, C&S collection (5-10 specimens), and moored equipment. Can BP confirm how many moorings are required, and an estimate of the total benthic footprint? We believe they are planning on a maximum of 17 transponders + 1 mooring for the oceanography program + 2 moorings for acoustic monitoring. Is this correct? The wording is a little unclear in Section 2.3.2.	
	DFO	<b>2.3.1, Transponder Placement</b>	Is it possible to have a figure showing the location of the transponders?	
	DFO	<b>2.3.2 Environmental Monitoring Using Moored Instruments</b>	Figure 2-3: Wave Rider and Mooring Assembly Figure 2-3: Wave Rider and Mooring Assembly Why is there 76m between the anchor and acoustic release? Will 76m of neutral/positive bouyant rope be left on the seafloor?	
	DFO	<b>2.3.3, Seabed Monitoring and Sampling</b>	"Other sediment monitoring and sampling technologies of similar footprints (1-2m2) may be used and would be deployed via the ROV or the vessel." Outline the other sediment monitoring and sampling technologies, other than push cores or multicores, that may be used and in what scenarios this may happen.	
	DFO	<b>Section 2.3.3, Seabed Monitoring and Sampling ROV push cores</b>	"An ROV will be used to collect sediment cores of the seabed at varying distances" Can you provide details onto the range of distances?	
	DFO	<b>2.3.3, Seabed Monitoring and Sampling, Multicorer</b>	"The multicorer option is presently not available for the pre-drilling sediment sampling due to logistical constraints" What are the constraints? How will these be over-come?	
	DFO	<b>4.1.1. 2022 Ephesus Coral and Sponge Survey</b>	Figure 4-1 Total Sea Pen Abundance Across All 50 m Transects (bp Canada 2023) Should this read "Total Sea Pen Density Across All 50 m Transects"?	
	NL FFA	<b>2.2 Schedule</b>	The amendment proposes broadening of the temporal scope to include activities from March to October. This timeframe is during peak fisheries season for many commercially important fisheries adjacent to Newfoundland and Labrador. The project includes potential interactions with fisheries and other ocean users. The fishing industry is an important ocean stakeholder and as such, FFA recommends the proponent maintain engagement with fish harvesters in adjacent areas as a top priority throughout the duration of the project's life stages.	
	NL FFA	<b>Section 4.1.1 2022 Ephesus Coral and Sponge Survey</b>	The proponent notes that several species of finfish, including the Northern wolffish (Schedule 1 SARA species), as well as squid and shrimp were found along several survey lines. Although the proponent notes in Section 4.6 that the chosen area is located in a marine refuge, where there is a prohibition on bottom contact fisheries activities, there are fishing areas adjacent that should be considered.	
	NL FFA	<b>Section 4.1.1 2022 Ephesus Coral and Sponge Survey</b>	Though the proponent recognizes that the project area overlaps with large gorgonian corals and sea pens as sampling work will be completed, as outlined in Section 4.1.1, FFA further highlights the vulnerability of these species, and that they play fundamental roles in benthic ecosystems. It is advised that the work in these areas proceed with caution as these species are easily disrupted.	

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Number	Reviewer	Section	Comment	bp Response
	NL FFA	<b>Section 4.4.1., Recovery Strategies and Plans</b>	There have been increased sightings of NARWs in Newfoundland and Labrador waters in recent years. The NARW is particularly vulnerable to extinction, being that it is a slow growing species with only approximately 336 animals remaining worldwide. Fisheries and Oceans Canada (DFO) and Transport Canada have implemented a number of protective measures in an effort to minimize interactions with NARWs, including listing them as Endangered under the Canadian federal Species at Risk Act (SARA). From an economic perspective, Canada is now required to demonstrate stringent efforts to protect marine mammals to meet the United States (U.S) Import Provisions under the Marine Mammal Protection Act so that Canada may continue to export fish and seafood to the U.S. The proponent should be aware of the possibility that interactions with NARWs can affect Canada's ability to export seafood. Under Federal Marine Mammal Regulations, the proponent must keep a minimum of 100 meters away from whales, dolphins, and porpoises, and keep a minimum of 200 meters away if they are in resting position or with their calf.	
	FFAW	<b>General Comment</b>	The amended temporal scale warrants extensive and continuous communication with the fishing industry throughout. The overall length and frequency of field programs has increased. Between March and October, countless fisheries open and close, hundreds of vessels will traverse the surrounding area and thousands of fishing lines will encompass the outer limits of the project location. Extreme caution and attentiveness are imperative when navigating outside of the Marine Refuge where turbot fishing grounds exist. There is an expectation that proactive consultations with the fishing industry will occur. It is crucial that effective and regular communication takes place with FFAW throughout the lifespan of these activities particularly due to the seasonality and location. Proactive mitigation will ensure minimal risks. We look forward to building upon the existing channels of communication established with bp thus far.	