

Groundfish Enterprise Allocation Council

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November 4, 2015

Darren Hicks
Canada Newfoundland Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL, A1C 6H6

Dear Mr. Hicks,

Thank you for the opportunity to provide comments on the draft scoping document for CCG Services (Canada) Inc., Newfoundland Offshore Seismic Program, 2016-2025.

As you may be aware, the Groundfish Enterprise Allocation Council represents the groundfish interests of greater than 100' licence holders in Atlantic Canada. Cumulatively, this represents access to over 50,000 mt of groundfish in marine waters extending from the northern to southern limits of the Atlantic region.

Specific to your request issued on October 22nd 2015, we would like to identify ourselves as an agency that may have expertise in support of the EA process. We also wish to submit comments on the draft scoping document. Our detailed comments are expressed below:

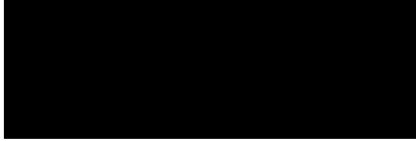
Section 5.2.4 – Our membership has reported multiple impacts associated with seismic exploration operations. This has ranged from direct observation of tissue damage in flatfish to reductions in catch rates in areas proximal to exploration activities. We encourage this information to be included and expanded upon through focused study to support this proposal, especially as it pertains to planning survey implementation to minimize impacts to existing commercial operations and research vessel surveys.

Section 5.2.8, 5.2.9 and 5.2.10 – Similar to our request above, the presence of the vessel and the resultant acoustic noise derived from the seismic survey has been demonstrated to impact commercial catch rates of various species. A detailed mitigation plan is requested to be described within the EA with supporting rationale of why it will be effective. GEAC may be able to contribute to this discussion by providing confidential fishing records that demonstrate avoidance measures (both spatially and temporally) that we have found to be effective. Any mitigation being proposed should be extended to include DFO Research Vessel and industry supported research surveys.

Section 5.2.12 – We suggest that the effectiveness of the mitigation measures aimed at maintaining commercial catch rates through survey design be assessed through a follow-up monitoring.

Thank you for the opportunity to comment on the scoping document and we look forward to our continued involvement in the Environmental Assessment.

Sincerely,



Cc: GEAC Membership