

General Comments

- Generally, a thorough review of the available literature and knowledge related to effects of seismic activities on marine ecosystems.
- Under section 2.5.5, the report states that the seismic vessel “may have a FLO and a MMO(s) on board”. The Nunatsiavut Government would prefer to see the wording “the seismic vessel will have a FLO and a MMO(s) on board”. Moreover, the Nunatsiavut Government would like to see Aboriginal Labradorians, especially Inuit, employed as FLOs and MMOs for the purposes of this work. Inuit are keen observers of the ocean and many have previously been employed as observers onboard marine vessels in these sorts of capacities.
- It is extremely important to the Nunatsiavut Government that the aboriginal fishery (offshore and nearshore) is not disturbed or negatively affected by the proposed seismic program. The area proposed for seismic activity is extremely important to the Nunatsiavut fishery and will probably become more important in the future. As a mitigating factor, we recommend that the Torngat Joint Fisheries Board have input into the EA process and the seismic program during its implementation.
- Although a general outline of the project area was indicated, we would like to have information on specific proposed seismic survey lines in order to more accurately evaluate project footprint and seismic survey impacts.
- With the recognition that there may be three concurrent seismic programs in the project area, we would like to see much more quantitative analyses with respect to the potential cumulative effects of these operations. With this in mind, we would also recommend a follow-up and monitoring program for fish and shellfish within the area.

- We would also recommend a follow-up and monitoring program regarding catch rates (fishing success) for the aboriginal fishery in and near the study area to ensure that catch rates are not decreasing. If there are effects being detected, then mitigative measures will have to be put in place over the duration of the seismic program.
- It has been demonstrated within the scientific literature that Inuit Knowledge (or Traditional Ecological Knowledge, more broadly) is a valuable source of knowledge that can complement and augment knowledge and information from a western scientific standpoint. In most studies of Arctic ecosystems, such as those that are completed within Environmental Assessments, it is recognized that the absence of Traditional Ecological Knowledge is a gap. After reviewing the EA, nowhere is Inuit Knowledge integrated into the environmental assessment in a meaningful way in terms of potential issues associated with the physical environment or marine resources. The incorporation of Inuit Knowledge should be required within the environmental assessment. In this way, Inuit Knowledge and western science can come together to form a combined, and much more holistic and accurate understanding of the potential effects of the proposed seismic program on the project and affected areas, through collaborative inquiry and analysis.
- We recommend that the Proponent use a local fishing guide vessel to reduce conflicts with fishing vessels and gear. This would result in local employment opportunities while providing more effective communications with fishing vessels due to intimate knowledge of the local area and fishery.