

Hello,

I wanted to express concern over the Old Harry prospect geohazard survey program 2010-2020, and its environmental assessment study presented by Corridor Resources in May 2010 to the Canadian-Newfoundland and Labrador Offshore Petroleum Board.
(<http://www.cnlopb.nl.ca/pdfs/corrgeo/cgea.pdf>).

I work for GREMM, a non-profit organization with scientific expertise with whales of the St. Lawrence, based in Tadoussac, Quebec. We have been involved in providing scientific advice for similar projects in the Quebec side of the Estuary and Gulf of St. Lawrence between 2002 and 2004. This process has led to a "Bureau d'audiences publiques sur l'environnement"(BAPE) on seismic surveys in the St. Lawrence.

I would like to re-iterate comments and concerns expressed then, and that apply just as well to the present environmental assessment:

- The literature review for cetaceans seems incomplete and some interpretations seem incorrect, and are likely to underestimate the risks for certain species. One example: blue whale is stated to be "uncommon" in the project area. In fact, the population, listed as "endangered" under SARA, is present in low numbers in the St. Lawrence (probably less than 250 mature individuals). Therefore, even if it might not be common to see a blue whale there, it is a migratory corridor for the entire population, it is susceptible to be an important habitat for this endangered species, especially in the fall, the period of the project.
- Mitigation measures are debatable and could be insufficient to lower the risks for cetaceans to acceptable levels. For example, the area of detection is 500 m, which is smaller than in other similar projects. Furthermore, these types of mitigation measures (marine mammal observers, ramping up, etc.) do not eliminate risks of physical injuries and do nothing to reduce the risks of behavioural impacts (disturbance, displacement, stress, masking of sounds for reproduction, etc.).
- It appears that no marine mammal specialist was consulted by Corridor Resources to produce this Environmental Assessment.
- As stated by BAPE's report in 2004, the cumulative impacts of such a project should consider that it is a first step to a new industry for the St. Lawrence Gulf, that is oil and gas exploitation.
- This new industry will have impacts on several existing industries in five provinces, that is Newfoundland and Labrador, Nova Scotia, Prince Edward Island, New Brunswick and Quebec. It seems irresponsible, especially in light of the recent events in the Gulf of Mexico, to go forward without a vast, encompassing study looking at all the relevant issues and making strict recommendations leading to strong legislation to ensure safety and minimal risks.

Therefore, I would suggest to not grant the permit for this project before a detailed, independent review of the risks levels for cetaceans and, more importantly, a vast multi-provincial assessment of the risks and benefits of this new industry for the Gulf of St. Lawrence.

Thank you for reading this e-mail.

Best regards,

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