

Western Newfoundland 2017 Controlled Source Electromagnetic (CSEM) Survey-
Addendum to Environmental Assessment (Stantec September 7, 2017)

GENERAL COMMENTS

Environment and Climate Change Canada (ECCC)

1. Clarification of Oil-based products in Transmitter and/or Receivers

ECCC-CWS recommends that the towfish be thoroughly checked for hydrocarbon leakages before and after deployment. If hydrocarbon leaks are found in the towfish, the device should not be used until the leaks are repaired.

2. Mitigations - Oil Pollution Incidents

Quote: "*Marine and/or migratory bird species at risk known to occur within the RAA are unlikely to interact with a hydrocarbon spill because they either have strong coastal affinities and are unlikely to occur in the Project Area or occur in winter, which is outside the time frame of the Project.*"

There are migratory bird species which will occur within the RAA in the summer (i.e. foraging beyond colony boundaries, as well as non-breeders) that should be considered. The proponent must be prepared to deal with migratory birds in hydrocarbon spill plans at all times of the year.

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The St. Lawrence Coalition (SLC)

1. The promoter does not answer the fundamental question of the project justification. WHY is this project necessary? The promoter explains that the surveys will be done according to high environmental standards, but they do not answer the basic question of « why do this project in the first place? »
2. The promoter has agreed to have two birds and marine mammal observers on board. This is excellent news. However, in many parts of the Addenda, it is still mentioned that only one observer will be on board. The text needs to be uniformized so that it is clear the two birds and marine mammal observers will be on board at all time.
3. The promoter writes in the EA Report that they will deal only with a fishing representative (Fishing Liaison Officer) from Newfoundland. We asked if they consulted fishermen from other provinces, because fishing zones have little relation with province of origin of the fishermen. They replied that they consulted only Newfoundland fishermen (One Ocean) as per the scoping document. This is not accurate! If you look at the scoping document (section 4.7) it is clearly written that all users of the ocean potentially affected should be consulted. Two documents produced by One Ocean are suggested as guides to the consultation. The CNLOPB, in the scoping document, does not limit the fishermen consultation to those living in Newfoundland. Fishermen from other Gulf provinces should definitely have been consulted.

C-NLOPB

Section 4.3 Issues Scoping and Selection of Valued Components, Fisheries and Other Ocean Users

Quote: “As per the Scoping Document, the One Ocean Protocol for Consultation with Fishers was followed. This document provides contact information for fishery organizations in Newfoundland and Labrador whom were consulted.”

How will communication by EMGS with fishing interests/ocean users that may be active in the area during the conduct of the program occur? EMGS should describe their plans for communication to fishing interests/ocean users before commencing the program and also while the program is in progress.

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Fisheries and Oceans Canada (DFO)

Section 5.2.6 Species at Risk (Table 5.11 - Routhead Grenadier, American Plaice (Newfoundland and Labrador population), Striped Bass (Southern Gulf of St. Lawrence population), White Hake (Southern Gulf of St. Lawrence population), Spiny Dogfish (Atlantic population), and Northern Bottlenose Whale (Davis Strait-Baffin Bay-Labrador Sea population), pages 18-19 – The population given for Spiny dogfish is incorrect and should be “Atlantic”, not “Southern Gulf of St. Lawrence” population.

Section 5.2.7 Sensitive Areas (pages 5.53-5.54), pages 20-21 – Figure 32 in Kenchington et al. (2016) appears to show at least one significant sea pen location (indicated as a brown polygon for 2015) in the Project Area. Significant sea pen areas should be rechecked against the Project Area and text revised accordingly.

Section 5.2.7.1 Ecologically and Biologically Significant Areas (page 5.54), pages 21-22 – The edited wording of this paragraph is missing text. Sentence 3 should be changed from “Ecologically and Biologically Significant Areas (EBSAs) are areas that have particularly high ecological or biological significance which may facilitate provision of a greater than usual degree of risk aversion in the management of an important design feature of MPA Networks.” to “Ecologically and Biologically Significant Areas (EBSAs) are areas that have particularly high ecological or biological significance which may facilitate provision of a greater than usual degree of risk aversion in the management of activities in these areas. EBSAs have been identified as priority areas for protection and an important design feature of MPA Networks.”.

Section 5.3.1.3 Aboriginal Fisheries (2nd and 3rd paragraph, pages 5.72-5.73), page 23, 4th sentence - “(MAMKA)” should be added following “Mi’kmaq Alsumk Mowimsikik Koqoey Association”.

Section 6.2.2 Project Interactions (paragraph 3, page 6.3), pages 24-26 – Part of original comment is missing. First sentence should read “Please provide a description of the disturbance to benthic habitat and species (e.g., dimensions of receivers, total area affected, depth of disturbance, affected species)” instead of “Please provide a description affected, depth of disturbance, affected species)”.

Section 6.2.3 Mitigation (2nd bullet, page 6.3), page 26 – Addition should also be made to Section 6.3.3 Mitigation (1st bullet, page 6.7).

Section 6.5 Species at Risk (2nd sentence, paragraph 3, page 6.15), page 30 – Sentence still needs to be revised to reflect 23 species populations listed on Schedule 1 of SARA, instead of 22.

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Section 6.6.4 Assessment of Residual Environmental Effects (Receiver Deployment and Retrieval, page 6.29), pages 33-34 – Figure 32 in Kenchington et al. (2016) appears to show at least one sea pen location (indicated as a brown polygon for 2015) in the Project Area. Significant sea pen areas should be rechecked against the Project Area and text revised accordingly.