

From: St. Lawrence Coalition (SLC)
Sent: Sunday, September 24, 2017 9:30 AM
To: Hicks, Darren
Cc: Burley, Dave; Young, Elizabeth
Subject: Re: Electromagnetic Geoservices Canada, Inc., Western Newfoundland Controlled Source Electromagnetic Survey, 2017

Dear Darren,

We have reviewed the promoter's answers to our questions/objections and they mostly satisfy us. However three of the answers are in our view inadequate. Considering the quality of the French translation of the Addenda provided by Stantec, we have written our critics in French (see below). Please forward them as such to Stantec.

However, we think it is important that you be made aware of these comments, so we offer an English résumé:

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.

Thanks,
Sylvain Archambault
St. Lawrence Coalition

Section to be sent to Stantec :

Section 1.1 Motif du Projet (page 1.1)

Le promoteur ne répond pas vraiment à la question fondamentale : pourquoi se projet de levés géophysiques devrait-il avoir lieu ?

Section 2.2.1 Fonctionnement du navire de leve? (page 2.2)

Dans ses réponses à la Coalition Saint-Laurent, le promoteur s'engage à avoir recours à deux observateurs d'oiseaux et de mammifères marins. C'est une excellente chose. Toutefois, il est souvent mentionné dans l'Addenda qu'il n'y aura qu'un seul observateur. C'est le cas par exemple lors des réponses à l'OCTNLHE ou à Pêches et Océans (MPO), aux pages 2, 3, 16, 30, etc. Le Rapport d'évaluation environnementale devrait être uniformisé pour affirmer clairement, partout, qu'il y aura deux observateurs d'oiseaux et de mammifères marins.

Section 3.0 Consultation et participation, tableau 3.1 Commentaires souleve?s pendant les consultations, agent de liaison avec les pe?cheurs, page 3.3 Le promoteur affirme qu'en vertu du document de portée (scoping document) il n'était tenu de consulter QUE les groupes de pêcheurs de Terre-Neuve mentionnés dans un document de One Ocean. La Coalition Saint-Laurent est en complet désaccord avec cette vision. En effet, le texte du document de portée (point 4.7, page 2) est très clair:

1. « Le rapport sur les consultations mene?es par EMGS aupre?s des autres utilisateurs de l'oce?an qui pourraient e?tre touche?s par les activite?s du programme »

Le document de portée mentionne aussi que deux documents de One Ocean peuvent servir de guide lors de la tenue des consultations [auprès des autres utilisateurs de l'océan]. On ne dit pas de limiter les consultations aux organismes listés dans le document de One Ocean. Le promoteur aurait donc dû consulter les représentants des pêches des autres provinces, compte tenu que les zones de pêche ne respectent pas les limites interprovinciales.

Merci,

Sylvain Archambault
Coalition Saint-Laurent

Le 13 sept. 2017 à 09:11, Hicks, Darren <DHicks@cnlopb.ca> a écrit :

Good morning Sylvain: please see the attached EA Addendum for the above mentioned project. The C-NLOPB requests that you review the Addendum and determine if your comments have been satisfactorily addressed. Your response should be forwarded no later than September 27, 2017. If no comments are received, the C-NLOPB will assume no comments will be submitted.

If you have any question please feel free to contact us. Further details on this program may be found here <http://www.cnlopb.ca/assessments/egcsurvey.php>.

Regards
Darren

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