

From: Pulchan, Jerry (ECCC) <Jerry.Pulchan@ec.gc.ca>  
Sent: Friday, July 8, 2022 12:32 AM  
To: Hicks, Darren  
Cc: Worthman, Sydney (ECCC); Hingston, Michael (ECCC)  
Subject: FW: EMGS Controlled Source Electromagnetic Survey - 2022 EA Update  
Attachments: ECCC-CWS\_Guidance\_StrandedBirdSurveyProtocol\_Mar2021.pdf; Appendix 1 Stranded Bird Encounter Datasheet\_Mar2021.pdf; Appendix 2 Guidance procedures infographic.pdf; Appendix 3 Seabird Identification Photo Card 2017.pdf; Best practices for stranded birds\_CWS\_2017.pdf; ECCC\_StrandedBirds\_DataEntryForm\_V1.1.xlsx; GuidelinesforWRP\_2021\_ENG.pdf; 8\_NWER\_WildlifeEmergencyResponsePlanTemplate\_EN.docx

Darren,

Environment and Climate Change Canada (ECCC) has reviewed EMGS' Controlled-Source Electromagnetic Survey – 2022 EA Update.

Please note also that ECCC's previously submitted general comments on this project are still applicable and additional comments from ECCC's Canadian Wildlife Service (CWS) are provided below.

Please let me know if you have any questions.

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Environment and Climate Change Canada's Canadian Wildlife Service (ECCC-CWS) has reviewed EMGS' Controlled-Source Electromagnetic Survey – 2022 EA Update, submitted by Electromagnetic Geoservices Canada Inc., and offers the following recommendations.

1. Quote (page 22) "The SMMO will be on board to conduct routine checks for stranded bird and Canadian Wildlife Service (CWS) bird handling and release procedures (e.g. Environment and Climate Change Canada 2016) will be implemented if stranded birds are encountered on the vessel."

ECCC-CWS notes that the location of the survey is located relative to known foraging habitats of Leach's Storm-petrel (COSEWIC-assessed as Threatened in November 2020), particularly from important breeding colonies at Gull and Baccalieu Island. The project has the potential for increased interactions with Leach's Storm-petrel and other migratory birds, particularly with respect to attraction to artificial lighting and potential strandings on vessels and project infrastructure (per Gjerdrum et al. 2021, storm-petrels are the most commonly stranded species in NL (93%) based on reports from 1998-2018). The location and proposed timing of activities overlap with peak storm-petrel stranding period (mid-September to mid-November) when

young Leach's Storm-petrel fledge and make their first flight offshore.

The prompt location of stranded birds through daily, systematic searches of vessel(s) increases the potential of reducing harm and/or mortality of stranded birds. Gjerdrum et al. 2021 states per reports, 98% of stranded storm-petrels found alive were successfully released back to the ocean.

ECCC-CWS recommends that the proponent develop and implement vessel-specific systematic search protocols for stranded birds that will be undertaken by trained, experienced observers. Additionally, ECCC-CWS notes that new guidance has been developed, to complement the Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada (ECCC, 2017), regarding the development and implementation of systematic stranded bird protocols. Guidance has been attached for the proponent's consideration.

- ECCC-CWS Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms.
- Appendix 1 – Stranded Bird Encounter Datasheet
- Appendix 2 – Infographic and Reference Card – What to do when you find a stranded bird?
- Appendix 3 – Seabird Identification Photo Card
- Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada
- Stranded seabird datasheet (2022)

2. Quote (page 22) "In accordance with the MBCA, a Federal Migratory Bird Permit will be obtained from the CWS for handling stranded birds that may be encountered on the vessel. A salvage report will be filed with CWS as required by the permit."

ECCC-CWS notes that Permit applications can be obtained from via email at: [Permi.Atl@ec.gc.ca](mailto:Permi.Atl@ec.gc.ca) . Any data collected from stranded bird surveys during the survey should be documented using the stranded bird datasheets and hard or scanned copies of datasheets sent to CWS at: [ec.scfatldonneesei-cwsatliadata.ec@ec.gc.ca](mailto:ec.scfatldonneesei-cwsatliadata.ec@ec.gc.ca) .

3. Given the high potential for migratory bird strandings, particularly Leach's Storm-petrel in mid-September to mid-November, ECCC-CWS recommends that the proponent consider including stranded seabird awareness training for all members on the vessel, to ensure that individuals are adequately informed of potential impacts to migratory birds. ECCC-CWS is able to provide awareness materials for the proponent's consideration, if desired.

4. Quote (page 107) "EMGS is aware of the CWS Response Plan Guidance for Birds and Oil (ECCC 2012). EMGS will consult with ECCC-CWS for appropriate response, handling, and monitoring of marine and/or migratory birds in the event of a spill."

ECCC-CWS notes that the "Birds and Oil" (ECCC, 2012) document is an old guidance document that is superseded by ECCC 2021 "Guidelines for effective wildlife response plans" (attached). An

editable template (Appendix A of the “Guidelines for effective wildlife response plans” document) is also attached for the proponent’s consideration.

ECCC-CWS recommends that the proponent develop a Wildlife Emergency Response Plan (using the attached guidance), as a part of the “Shipboard Oil Pollution Emergency Plan” referenced on page 106. The WRP should address all of the various procedures and strategies required to mount an effective wildlife response, in the event of a pollution incident affecting wildlife. ECCC-CWS recommends that the proponent send draft Wildlife Emergency Response Plans to ECCC-CWS for review, in advance of their implementation.

Please let us know if you have any questions.

Thanks!

Sydney

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