

DFO Comment:

DFO recommends that ExxonMobil adhere to SOCP and contact DFO prior to the start of the seismic program to avoid interference with DFO research vessel surveys.

EMCP Response:

As stated in the CSR and CSR Addendum, EMCP is committed to following the mitigations outlined in the Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment as appended to the Geophysical, Geological, Environmental and Geotechnical Program Guidelines. In addition, as stated on page 5 of the CSR Addendum, EMCP will contact DFO prior to the 2013 survey start date to confirm the timing and location of fisheries research surveys.

FFAW Comment:

By virtue of submitting an addendum it would have been appreciated if fisheries data was included with the Amended Offshore Project Area. This is particularly pertinent as the change is of significance, and the document fails to supply any of the data. Looking at the EA Update which was submitted in May 2013 it is evident that there is harvesting for Snow Crab taking place within what is now the Amended Offshore Project Area (See Figure B-2 in EA Update). In light of this, the FFAW would suggest that consideration be given of this matter for what is submitted in the Comprehensive Study Report Addendum

EMCP Response:

Updated fisheries data was presented in the 2013 EA Update, submitted to the C-NLOPB on May 2, 2013. Fisheries data, as obtained from DFO up to April 2013, is summarized on page 5 and Appendix B. The CSR Addendum did not specifically provide an update to the fisheries data, as this information was captured in the 2013 EA Update, and identifies fishing activity seismic survey area. In addition, during the FFAW consultation session EMCP described the survey area, including the expanded turning radius area, and provided the updated fisheries data. In turn, the fishers at the meeting identified potential crab fishing areas, inside and outside the amended Project area. These areas have been included in our survey planning. The conclusions reached in the CSR Addendum, regarding potential interference with fishing activity from a larger turning radius, are based on potential interactions within the larger Study Area, with application of mitigation measures. The fishing data presented in CSR and the 2013 EA Update support that conclusion. In addition, the CSR Addendum specifically identified all the mitigation measures in place to prevent interaction with fishing activities.

FFAW Comment:

Looking at page 4 of the Addendum it is indicated that there would continue to be not significant effects predicted from the activities of having 12 rather than 10 streamers. It is given that with an increase turning radius and the mitigation effort required for Marine Mammals, the range of the exposure to the sound signature will be expanded. The FFAW has invariably highlighted the concerns that there have been repeated observations by harvesters that seismic activity has a negative impact on the catch rates experienced in Newfoundland & Labrador waters

EMCP Response:

The potential sound exposure, from the firing of a single array for marine mammal mitigation, was addressed in the CSR. The CSR assessed the potential effects of sound from seismic sources on fish, shellfish and marine mammals in offshore Study Area, not the Project Area. The Project Area, as amended, is within the Study Area. All activities within the amended Project Area were assessed within the larger defined Study Area.

FFAW Comment:

On page 5 of the Hebron Project comprehensive Study Report Addendum, there are a few items that stand out and need to be addressed. What is being called the DFO post-season crab surveys in the document should in fact be referred to as Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab.

EMCP Response:

We acknowledge the point made that the “DFO post-season crab surveys” could be referenced as “Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab.”

FFAW Comment:

The text goes on to reference the DFO-Industry Post-Season Crab Survey with Figure 5-1, the problem with this is that there is a disconnect between text and depiction. The DFO-Industry Post-Crab Survey uses fixed locations for surveying, what is depicted and described in Figure 5-1 are vessel transects – it is suspected that what is depicted are DFO-RV trawl surveys, but without knowing the FFAW cannot be certain in this.

EMCP Response

Figure B-8 in the EA Update illustrates research vessel location; Figure 5-1 was included in error. However, the CSR Addendum correctly states that the 2013 “Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab” will occur in the same locations as in 2012, as advised by DFO.

FFAW Comments:

Furthermore, the text is listing the post-season crab survey to have started on August 29th, 2012. DFO did not issue the scientific licenses for the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab until September 1st, 2012.

EMCP comment:

DFO provided the following text to our consultant Stantec, in response to a query regarding the timing of 2013 surveys. “The 2012 Post Season Crab Survey ran from 29 August to November 17.”

FFAW Comment

Relating this to the EA Update submitted to the Canada-Newfoundland & Labrador Offshore Petroleum Board on May 2nd, 2013, the last paragraph of page 8 was never linked to the depiction in Figure B-9 in the Appendix – this has in effect been in the Study Report Addendum.

EMCP Response:

Noted. See response above regarding vessel survey locations.

As industry is involved in some of the science work that is taking place (particularly the DFO-Industry Post-Season Crab Survey), EMCP would be advised to contact both DFO and FFAW Science divisions to clarify the discrepancies identified.

EMCP Response:

We are committed to maintaining an open dialogue with the FFAW and DFO to ensure awareness of DFO and FFAW activities in the offshore area.