



**Nunatsiavut**  
kavamanga Government

Nunaligninikmik amma  
Nunamiutanik Ujaganik Imaniklu  
Lands and Natural Resources

April 15, 2010

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**Re: Comments on the Environmental Assessment for the proposed Husky Energy seismic program in offshore Labrador**

Dear Mr. Hicks,

Please find attached our comments with respect to the Husky Energy environmental assessment of the proposed seismic program for offshore Labrador. We have conducted a review of the adequacy of the environmental assessment in terms of how it has fulfilled the requirements of the scoping document and on the technical merit of the information presented. If you have any questions or require clarification regarding anything contained within this review, please do not hesitate to contact me.

Best regards,

Tom

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## General Comments

- In general, the relative uncertainties with respect to seismic effects and underwater noise should be acknowledged in a realistic and open manner. These uncertainties are readily acknowledged by experts in the field, as they are trying to put in place research programs and processes to fill gaps in knowledge with respect to underwater noise, especially effects on marine life. Given the expert recognized and accepted gaps in knowledge that exist with respect to underwater noise, the residual environmental effects to VECs should be re-visited, especially the level of confidence that is associated with each residual adverse environmental effect rating. One would assume that, generally speaking, absence of knowledge (i.e. knowledge gaps) would not lend themselves to extremely high levels of confidence with respect to predictions of adverse environmental effects.
- There are also significant gaps in knowledge with respect to long-term impacts of seismic activity on fish behaviour and shellfish distribution patterns. Although studies have not directly linked seismic activity with fish or shellfish mortality, it is unknown whether behavioural changes as a result of seismic activity may affect migration or reproduction. This uncertainty should be acknowledged and incorporated into the EA. Moreover, in terms of mitigation with respect to this gap in knowledge, the precautionary principle should be incorporated within the EA to responsibly mitigate effects on the environment and fishery.
- It is extremely important to the Nunatsiavut Government that the aboriginal fishery (offshore and nearshore) is not disturbed or negatively affected by the proposed seismic program. The area proposed for seismic activity is extremely important to the Nunatsiavut fishery and will probably become more important in the future. As a mitigating factor, we recommend that the Torngat Joint Fisheries Board have input into the EA process and the seismic program during its implementation.

- Although a general outline of the project area was indicated, we would like to have information on specific proposed seismic survey lines in order to more accurately evaluate project footprint and seismic survey impacts.
- As stated in the Environmental Assessment, observers will play a key role in ensuring mitigation measures should the proposed seismic program proceed. It is strongly suggested that the Proponent incorporates Inuit observers onboard the seismic vessels. Inuit are keen observers of the ocean and many have previously been employed as observers onboard marine vessels in these sorts of capacities.
- With the recognition that there may be three concurrent seismic programs in the project area, we would like to see much more quantitative analyses with respect to the potential cumulative effects of these operations. With this in mind, we would also recommend a follow-up and monitoring program for fish and shellfish within the area.
- A compensation plan is mentioned for potential interactions with the fishery resulting lost of damaged fish gear. Please provide specific details on the compensation plan and whether local (including aboriginal) fishery organizations of fishermen have been consulted in the development of this plan.
- It has been demonstrated within the scientific literature that Inuit Knowledge (or Traditional Ecological Knowledge, more broadly) is a valuable source of knowledge that can complement and augment knowledge and information from a western scientific standpoint. In most studies of Arctic ecosystems, such as those that are completed within Environmental Assessments, it is recognized that the absence of Traditional Ecological Knowledge is a gap. After reviewing the EA, nowhere is Inuit Knowledge integrated into the environmental assessment in a meaningful way in terms of potential issues associated with the physical environment or marine resources. The incorporation of Inuit Knowledge should be required within the

environmental assessment. In this way, Inuit Knowledge and western science can come together to form a combined, and much more holistic and accurate understanding of the potential effects of the proposed seismic program on the project and affected areas, through collaborative inquiry and analysis.

- We recommend that the Proponent use a local fishing guide vessel rather than a picket vessel to reduce conflicts with fishing vessels and gear. This would result in local employment opportunities while providing more effective communications with fishing vessels due to intimate knowledge of the local area and fishery.