



Nunatsiavut
kavamanga Government

Nunaligninikmik amma
Nunamiutanik Ujaganik Imaniklu
Lands and Natural Resources

March 16, 2010

Darren Hicks, MES
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Re: Comments on the Environmental Assessment for the proposed Investcan seismic program in offshore Labrador

Dear Mr. Hicks,

Please find attached our comments with respect to the 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

Tom Sheldon
Director, Environment Division
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Spatial boundaries of proposed seismic

As defined in the environmental assessment, the assessment itself considers several levels of spatial boundaries, including the Project Area and the Affected Area. The Project Area is defined as the physical space that the surveys are undertaken, including a 10 km buffer to accommodate vessel turning with cables and streamers deployed. Effects of the Project are generally expected to be greatest within the Project Area. The Affected Areas are those areas that could potentially be affected by project activities beyond the Project Area. It appears that, according to the preceding definitions, Figure 3-1 and subsequent similar figures are incorrect. The seismic survey lines in the southwest corner of Gudrid indicated in Figure 3-1 extend beyond the Project Area. This would technically be impossible, according to the definitions above. Furthermore, it is clear that the Turning Area at the southwest corner of Gudrid as indicated in Figure 3-1 is also inaccurate. In this area, the 10 km Turning Area is not mapped with a 10 km buffer from the seismic survey lines as elsewhere on the Figure. It appears that the Project Area and Turning Area have been artificially reduced in this area so as not to enter 'The Zone', as defined in the Labrador Inuit Land Claims Agreement. Figure 3-1 and all subsequently similar figures should be corrected to ensure the accurate representation of the Project Area and Turning Area which, according to the definitions as laid out in the environmental assessment, would extend into 'The Zone' as defined in the Labrador Inuit Land Claims Agreement. Given that the effects of the proposed seismic program are most prevalent in the Project Area and the Project Area actually extends into 'The Zone' (according to the EA definition of Project Area in relation to the seismic survey lines indicated on Figure 3-1), this should be acknowledged accordingly by the Proponent in terms of environmental and economic mitigation/compensation for Labrador Inuit.

Effects on Aboriginal 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. In the EA, 'good communications' is referenced as a mitigating measure for space-use conflicts. While we agree that good communication is important, we believe that good communication should be better laid out in the EA (exchange of emails and fax is mentioned, but it is not clear how these exchanges will occur and when). As communication is going to be one of the key mitigative measures, the EA should incorporate a communications plan for the aboriginal fishery as well as other commercial or marine traffic. A mitigation plan for potential conflicts should also be more clearly laid out.

Also, given the Project Area overlaps with The Zone (see review comment above) there may be more extensive effects on the fishery in The Zone than predicted in the EA. This should be taken into account by the Proponent and environmental/economic mitigation should be considered for Labrador Inuit.

Cumulative Effects Analysis

The cumulative effects analysis for each valued ecosystem component within the EA is incomplete. A more exhaustive literature review of cumulative effects should be completed and more rigorous cumulative effects analysis should be incorporated into the EA. As they are currently laid out, the cumulative effects analyses are not based on science, but seem to be based on opinion. The cumulative effects analyses for most of the VECs have few, if any citations. In some cases (i.e. Section 5.4.5) the references present in the section cannot be found in the literature cited section. We feel the cumulative effects analysis section should be re-done much more rigorously and exhaustively.

Economic benefits for Inuit

As stated in the Environmental Assessment, observers will play a key role in ensuring mitigation measures should the proposed seismic program proceed. We strongly suggest that the Proponent incorporate Inuit observers onboard the seismic vessels. Inuit are keen observers of the ocean and many have previously been employed as observers onboard marine-going vessels. Inuit owned companies, such as Sikumiut Environmental Management Ltd. have a wealth of employees with experience conducting observation tasks onboard marine vessels.

Integration of Inuit Knowledge

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. We strongly feel that 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.