

MG3 (Survey) UK Limited Offshore

Data Acquisition and Seabed Sampling for Basin Modelling, Labrador Offshore to the Jeanne d'Arc Basin (2015 to 2024) - Environmental Assessment (Aivek Stantec June 2, 2015)

GENERAL COMMENTS

Environment Canada

Please note that EC's previous comments on the scoping document and project description (submitted to you on 27 April 2015) are still applicable to the project as described in the EA report with the exception of the following advisory from the Canadian Wildlife Service of Environment Canada (EC-CWS).

EC-CWS is providing additional information that was not available at the time of the review of the project description. A new draft document for handling stranded birds is now available that replaces the above Williams and Chardine protocol, and is attached below. The document is entitled "Best practices for standard birds encountered offshore - Atlantic Canada", and is dated April 2015. The document is still in development and a final version will be provided when available.

Fish, Food and Allied Workers (FFAW/Unifor)

It is paramount that MG3 ensures that the equipment used for seabed sampling is safely secured. Failure to do so and losing the equipment would result in a hazard for fishing vessel towing gear on the seabed.

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SPECIFIC COMMENTS

Canada – Newfoundland and Labrador Offshore Petroleum Board

Section 2.2 Project Area and Figure 2-1 2015 to 2024 Study Area and 2015 Project Area, pgs 3 and 4 – It should be made clear, both on Figures as well as in the text of the Environmental Assessment Report, that the “Project Area”, where all project activities between 2014 and 2019 are proposed, is the larger “Study/Project/Assessment Area” outlined in blue and not the smaller “2015 Project Area” outlined in green and orange. The “2015 Project Area” could be referred to as the “2015 Operating Area” or “2015 Program Area”.

Section 2.5 Schedule, pg 11 – The Temporal Scope should identify the months that activities are proposed, not just “ice-free season”.

Section 4.0 Stakeholder Consultation, 2nd para, last sentence, pg 37 – The Proponent should report on the meeting held with the Nunatsiavut Government in June 2015, as stated in the EA report.

Section 6.3 Cumulative Environmental Effects, pg 43 – Although overlap with other oil and gas exploratory programs or development project is not anticipated, it is expected that the Proponent commit to ongoing communications with other operators with active geophysical programs within the general vicinity of its program to minimize the potential for cumulative effects on the VECs.

Fisheries and Oceans Canada (DFO)

Section 2.7 Key Mitigation Measures, page 11 - The statement *“At no time will a survey vessel enter or attempt to conduct any survey work in restricted or protected areas ”* is mentioned throughout the Report. We recommend that the document clarify more precisely the nature of areas that will be avoided.

Section 3.2 Species at Risk, page 14 - Names of SARA-listed species should include the populations, as follows:

- Blue Whale - Atlantic population;
- Leatherback Sea Turtle - Atlantic population;
- White Shark - Atlantic population; and

The COSEWIC assessment level should be corrected for the following species as follows:

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- American Eel – Threatened;
- Cusk – Endangered; and
- Atlantic Bluefin Tuna - Endangered

The correct population name for Smooth Skate is Funk Island Deep population.

Names of COSEWIC-assessed species should specify populations, as follows:

- Acadian Redfish - Atlantic population;
- Deepwater Redfish - Northern population;
- Shortfin Mako Shark - Atlantic population;
- Harbour Porpoise - Northwest Atlantic population;
- Spiny Dogfish - Atlantic population; and
- Killer Whale - Northwest Atlantic/Eastern Arctic population

For completeness, White Hake (Atlantic and Northern Gulf of St. Lawrence population) should be included in this list as it has been assessed by COSEWIC as Threatened.

Section 3.7 Sensitive Areas, page 35

- In the description and listing of sensitive areas, we recommend distinguishing between Marine Protected Areas that have been established formally under the *Oceans Act* (such as Gilbert Bay), and other areas protected under other legislation.
- There are only 10 established areas of important coral and sponge concentrations in the Study Area; 1 is outside (south of) the Study Area.

Section 6.0 Environmental Effects Assessment, page 43 - Any incident that involves a dead or distressed SARA-listed species should be recorded and reported to the local DFO office immediately.

Fish, Food and Allied Workers (FFAW/Unifor)

Table 5.1, page 40 - It is almost identical to that which was Table 5.1 in an Environmental Assessment submitted in 2014 by TGS-NOPEC. The consultant is the same as is the work to be undertaken. Yet there are differences in what is being considered in Project-Valued Environmental Component Interaction. It is not expected for the proponent to rationalize the inclusions and considerations in an EA from 2014, but it would be pertinent to be advised of the difference in interactions.

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Section 5.5 Environmental Management, page 41 - Please provide clarification on the statement "...and a fishing gear damage compensation program (as per C-NLOPB and C-NSOPB 2002) ..., in the event of an oil spill."