



NUNATSIAVUT
kavamanga Government

Nunaligninikmik amma Nunamiutani
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,
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April 28, 2015

**Re: GEOCHEMICAL DATA ACQUISITION AND SEABED SAMPLING FOR BASIN
MODELLING IN LABRADOR OFFSHORE (2015 TO 2024)**

Dear Mr. Hicks,

Please find below our comments with respect to MG3's *Geochemical Data Acquisition and Seabed Sampling for Basin Modelling in Labrador Offshore (2015-2024)* environmental assessment report. It is important to take these comments in the context of our previous submissions and outstanding concerns to the C-NLOPB regarding seismic activity on the north coast of Labrador.

The Nunatsiavut Government has significant concern with the duration (2015 – 2024) of the proposed offshore program. The Labrador Coast is a poorly understood environment that is constantly changing. This includes, but is not limited to, changes in sea ice conditions and fish abundance. Recognizing that it is unlikely that this environment will be consistent and stable over the duration of the proposed project, it would be irresponsible to approve the project from an environmental and fisheries perspective.

Additionally, a review of the Labrador Shelf Strategic Environmental Assessment (SEA) is currently underway and is expected to be completed by 2017. Approving a project that goes well beyond this date would not be acceptable, given that the SEA guides project-specific environmental assessments. Therefore, the Nunatsiavut Government would recommend that a new project description be re-submitted for 2015-2017; at which point the proponent would be required to submit a new project for review.

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Furthermore, the level of detail provided within this project description is insufficient. There is no indication of what the potential impacts of all the activities may be on the environment, including fisheries and marine mammals. The project description states: *“Given the generally non-intrusive nature of the proposed Project activities (casting natural seabed seep samplers into the ocean surface using fishing line and collecting heat gradients and cores using a gravity corer from a science vessel), Project-environment interactions are anticipated to be few.”* This statement is misrepresenting the potential impacts of the project, as this does not consider all aspects of the proposed project (multi-beam echosounder, sediment coring, sub-bottom profiler). The Nunatsiavut Government requests that a new project description be submitted, with the proponent providing specific details on each aspect of the proposed project, including the potential impacts of each on the environment and what mitigation measures will be taken to reduce these impacts.

Finally, the Nunatsiavut Government requests in-person consultation with the proponent. We also request that an Inuit FLO and MMO be employed on the vessel, as is standard practice for offshore exploration programs taking place in Northern Labrador.

Thanks for your understanding,

Best regards,



Environmental Assessment Manager

cc., [REDACTED], Director of Non-Renewable Resources, Nunatsiavut Government
cc., [REDACTED], Director of Environment, Nunatsiavut Government