



May 19, 2015

Rodd Laing
Research Manager
Nunatsiavut Government
P.O. Box 70
Nain, NL A0P 1L0

Dear Mr. Laing,

RE: Environmental Assessment of MG3 Geochemical Data Acquisition and Seabed Sampling for Basin Modelling in Labrador Offshore (2015 to 2024)

This letter is in response to your April 28, 2015 correspondence to the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB).

To briefly summarize the process to date, upon submission of the *Project Description: Geochemical Data Acquisition and Seabed Sampling for Basin Modelling in Labrador Offshore (2015 to 2024)* (Aivek Stantec March 30, 2015) by MG3 on March 31, 2015, it was determined by the C-NLOPB that the proposed project would require an authorization pursuant to the *Accord Acts*. On April 9, 2015 the C-NLOPB provided the Project Description and Draft Scoping Document to potential agencies and departments, including the Nunatsiavut Government (NG), that may have expertise and would wish to participate in the environmental assessment (EA) of this proposed program offshore Labrador. We requested a response to this request, as well as any comments on the Draft Scoping Document, by April 23, 2015.

We must first point out that, as indicated above, the documents we provided to you for comment were a Project Description and a draft Scoping Document, and not an environmental assessment report. Review of matters relating to environmental effects (with their associated longer response timelines) can await the submission of the EA report.

With respect to your comment on the proposed duration of the program, we note that when a proposed project spans multiple years, the Proponent is required, in each subsequent year activity is planned, to provide the following to the C-NLOPB:

- An outline of the proposed activities for that year;
- Confirmation that the proposed program activities fall within the scope of the previously assessed program;
- Confirmation that the EA predictions remain valid; and
- Information regarding the adaptive management of requirements of the SARA into program activities (e.g., introduction of new species or critical habitat to Schedule 1; additional mitigations; implementation of recovery strategies and/or monitoring plans).

If there are any changes in the scope or if new information becomes available that may alter the original EA conclusions, then a revised EA will be required to be completed prior to subsequent authorization.

You also pointed out the planned timeline for the review of the Labrador Shelf Strategic Environmental Assessment (SEA) and suggested that the temporal scope of the project-specific EA should mirror that of the SEA review. An SEA typically involves a broader-scale environmental assessment that considers the larger ecological setting, rather than a project-specific environmental assessment that focuses on site-specific issues with defined boundaries. They are not meant as a replacement for project-specific EA. The objective of an SEA is to provide the type and level of information necessary to aid decision-making at the early stages of the rights issuance process – although they also may assist scoping and focus of subsequent project-specific environmental assessments.

Finally, respecting your stated expectations concerning consultation by the Proponent with the NG, and on provision of an Inuit FLO and MMO, we agree, and expect that the Proponent, in preparation of its EA report, thoroughly addresses these matters.

If you have any questions on the attached, or wish to discuss the above, I may be reached at 709-778-1431 or via email at dhicks@cnlopb.ca.

Yours truly,

Original signed by Darren Hicks

Darren Hicks
Environmental Analyst

C. D. Burley
E. Young
Harry Borlase
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