



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

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Darren Hicks
Canada-Newfoundland and Labrador Offshore Petroleum Board
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June 30th, 2017

Mr. Hicks,

Thank you for the opportunity to submit our comments on the EA amendment presented by Mult-Klient Invest in support of their proposed 2D and 3D seismic exploration originally described as the Multi Klient Invest AS Northeast Newfoundland Slope Seismic Program, 2012-2017.

We understand that this amendment was put forward to validate that the conclusions of the original assessment remain supported in light of increased, simultaneous effort planned for the 2017 season. Furthermore, we accept that having multiple simultaneous surveys is not new in NL waters, however we cannot conclude that because the surveys were conducted, no impact was experienced to fish, fish habitat or the fishery. This is especially important because such a rationale would not be sufficient in a decision-making context of fisheries management and this discrepancy is troublesome.

With respect to the assessment of effects, we must question some key components of the amendment proposal.

The impact to fish and fish habitat is clearly lacking in substance. Although the level of effect is expected to be 'non-significant', the confidence in the assessment is described as 'low to medium'. In the text, the introduction of a 30 km spacing between airgun arrays should decrease the 'probability' of synergistic effects, without describing what those effects may be; what scalar movement is required to reduce the synergistic effects; and how the 30 km distance will achieve this outcome. We cannot agree with the assessment presented.

Again, with reference to fisheries impacts, we find a similar absence of assessment. The gap in scientific knowledge leads to a low-confidence assessment of 'no impacts'. We feel that this conclusion is inconsistent with the precautionary approach to fisheries and habitat management that we are regulated under by the Department of Fisheries and

Oceans, and such a lens should also be applied in this assessment. As in the past, we contend that the impacts are significant and experienced far afield from the source location and last for an extended period after the airgun array has been deployed. This requires further study on the part of the applicant, and should be undertaken prior to exploration activity being further intensified (as is requested by this amendment).

We have historically attempted to address our concerns regarding the direct impacts of seismic activity on fishery activities on a case by case basis directly with the operator. This has been effective, save for some recent instances where planned activity has been re-allocated due to conflict with other sectors, leading to a direct impact on operations. Being forced to accept impacts to our activities because of a resistance of other sectors to accommodate seismic activities is unacceptable.

We cannot agree with the cumulative effects assessment as presented. The assessment is again challenged by a lack of knowledge on the impact of multiple surveys on fish, fish habitat and fisheries. Because of this lack of knowledge, a conclusion of 'no significant effect' is achieved, with a low to medium confidence in this decision. Again, we are forced to look at this in the context of fisheries and habitat management whereby an absence of information forces a precautionary approach to be applied. While we cannot make a decision on allowable stock removals or benthic impacts in face of poor information, why would we allow such activity in the context of seismic exploration?

Lastly, we note that the follow-up monitoring includes only sea turtles and mammals. Without a detailed plan to address existing data gaps, we are forced to ask how our understanding of direct and/or cumulative impacts of exploration will be understood without any monitoring or attempt to assess if those effects exist and the magnitude of those effects?

We are clearly concerned at this amendment and the apparent increase in seismic exploration activity in the Newfoundland and Labrador region. This is having real effects on our fishing activity and we suspect it is having impacts on the ecosystem itself. A continued identification of a data gap is not sufficient to adequately address our concerns and this must be rectified prior to further activity being authorized.

Thank you again for the opportunity to comment and we look forward to working with Multi-Klient Invest and the CNLOPB into the future.

Sincerely,



Bruce Chapman
Executive Director – CAPP
President – GEAC

Cc: Kevin Anderson
GEAC Membership
CAPP Membership