



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

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Darren Hicks
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6

July 28th, 2017

Mr. Hicks,

Thank you for providing MKI's response to the concerns raised by our June 2017 submission on the *Amendment of MKI's Environmental Assessment of the Northeast Newfoundland Slope 2-D Seismic Survey Programme, 2012-2017*.

We appreciate that MKI has undertaken to address our concerns but we must highlight that no additional evidence has been provided to dissuade our membership from their perspective on this project.

MKI's response actually echoes our understanding that a robust assessment of the immediate and residual effects of seismic exploration on fish, fish habitat and fishery catch rates is undermined by a significant dearth of knowledge, a travesty after so many years of intensive seismic activity in this region. We continue to view this as an area very much of concern, as decisions are being undertaken without the information needed for an effects assessment that fosters confidence in its results.

Furthermore, relying on demonstrated impacts to our livelihoods is not an effective method of designing a mitigation plan, as it places the onus on fishing enterprises to define the impact. In this situation, it would require us to absorb the high cost of deployment of vessel(s) to clearly 'demonstrate' that an impact is being experienced. This is a bastardization of the impact assessment process. It is the responsibility of the proponents, not the parties who are impacted, to provide robust evidence on the effects of seismic activity. As indicated above, MKI, GEAC and CAPP are all of common agreement that such an assessment cannot be made with the information at hand.

Our common agreement on the need for a robust impact assessment provides an opportunity for all parties to work towards a common goal. With the apparent support of MKI on this issue, we request the CNLOPB, seismic operators and the Newfoundland and Labrador oil and gas producers to provide the necessary funding and support to allow this key question of impact and mitigation to be addressed. Our concerns with

this specific project will not disappear and this will be a recurring theme in future project reviews unless the CNLOPB takes steps to effectively address this issue.

As an initial scoping exercise, an analysis of existing data sources in this region (fishery catch records and seismic activity plots) could filter and identify situations where seismic activity could have impacted fishery catch rates. Such analysis could narrow the range of uncertainty, and provide parameters for either further research or agreed upon mitigation/avoidance strategies. This study could easily be completed within a calendar year if there was commitment by all parties on the need, and support from the regulatory authority to achieve. We strongly request that such an approach be considered, with involvement of the fishing industry as appropriate.

We commend MKI on their excellent outreach. We expect this project will proceed and request that MKI work closely with our membership to minimize operational impacts on both parties.

Thank you again for providing us with the opportunity to share our perspective.

Sincerely,

A solid black rectangular box used to redact the signature of Bruce Chapman.

Bruce Chapman
Executive Director – CAPP
President – GEAC

Cc: Kevin Anderson
Wanda Wiseman
Bill Wells
GEAC Membership
CAPP Membership