



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

1362 Revell Drive, Manotick, Ontario, K4M 1K8 · Tel: (613) 692-8249 Fax: (613) 692-8250

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

March 13, 2018

Dear Mr. Hicks,

Thank you for providing MKI's response to the concerns raised by our submission on the *Environmental Assessment of Multiklient Invest Newfoundland and Labrador Offshore Seismic Program, 2017–2026 Addendum*.

We appreciate that MKI has undertaken to resolve our concerns but we must highlight that no new evidence has been provided.

Although we appreciate that MKI both acknowledges the data gap on impacts of seismic exploration on fish and invertebrate species and expresses their support in the studies being undertaken by the ESRF and PRNL on the matter, such acknowledgement does not address our concerns at hand. MKI is the proponent and should be willing to work on this understanding directly as opposed to shifting its responsibility to other organizations.

We encourage MKI to work with us and our members to generate an avoidance protocol that will create a level of comfort that any proposed work will not impact our operations. We ask that this protocol be ratified prior to this project proceeding.

We also note that the purpose of an EA is to assess impacts and provide mitigation. Where effects cannot be determined, a precautionary approach is an appropriate path to take. In this case, the gap has been highlighted, but no approach to directly mitigate this has been proposed, and we find this most troubling.

Again, we are being asked to act as test subjects in understanding the impacts of the activity and we again suggest that such an approach is inappropriate in this regulatory environment.

This being said, we again commend MKI on their excellent outreach and willingness to work directly with our affected membership to minimize operational impacts on both parties.

Sincerely,

Bruce Chapman
Executive Director – CAPP
President – GEAC