

Environmental Assessment of Multiklient Invest Newfoundland and Labrador Offshore Seismic Program, Response to Reviewer Comments on the Environmental Assessment of Multiklient Invest Newfoundland and Labrador Offshore Seismic Program, 2017–2026 Addendum (LGL March 2018)

GENERAL COMMENTS

Groundfish Enterprise Allocation Council (GEAC)-Canadian Association of Prawn Producers (CAPP)

Original Comment:

We appreciate the improved planning and activity reports that are described by the Addendum, but our concerns continue to exist, and some word-smithing of the report are not sufficient to address our concerns on the relationship between seismic exploration activity and catch rates experienced by our harvesters.

MKI Reply:

We acknowledge the existing data gap on the effects of seismic surveying on the catchability of commercial fish/invertebrate species. We understand that research funding bodies (ESRF and Petroleum Research Newfoundland and Labrador [PRNL]) have and will fund studies to address this data gap. As noted above, MKI will continue to support this important research.

Current Comment:

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.