From: Robyn Lee <rlee@ffaw.ca> Sent: May 21, 2021 5:25 PM

To: Hicks, Darren; 'Maureen Murphy Rustad'

Cc: Murphy, lan

Subject: Re: Multiklient Invest Newfoundland Offshore Seismic

Program, 2018 to 2023

Good afternoon Darren,

Following review and consideration of the proposed eseismic work I'd like to provide the following comments on behalf of FFAW members:

The EA amendment states there is substantial environmental benefit from the lower sound pressure level associated with eseismic but it is not clear how this statement has been derived. The document states that "we do not know how animals might respond to sounds from eseismic" yet the amendment predicts residuals effects from testing eseismic in line with conventional seismic sound. In the same paragraph it is also stated that systematic well-controlled studies of animal responses to eseismic sound are necessary before the relative effects from eseismic and conventional can be meaningfully compared.

With the limited information and evidence presented, regardless of the short duration of the proposed eseismic test, FFAW does not agree with the conclusion of this amendment that there will be no significant effects from the proposed project activity change. There is simply not enough information to make such predictions, particularly when there are still many data gaps associated with conventional seismic sound. (The report also mentions these data gaps).

Kind regards, Robyn

From: Hicks, Darren < DHicks@cnlopb.ca> Sent: Monday, April 26, 2021 10:34 AM

To: Robyn Lee <rlee@ffaw.ca>; 'Maureen Murphy Rustad' <Maureen.Murphy-

Rustad@mi.mun.ca>; Rick

Ellis (rellis@oceanchoice.com) <rellis@oceanchoice.com>; Derek Butler (dbutler@seafoodproducers.org) <dbutler@seafoodproducers.org>; 'Kris Vascotto' <kvascotto@atlanticgroundfish.ca>; Bruce Chapman <bchapman@atlanticgroundfish.ca>

Cc: Murphy, Ian < IMurphy@cnlopb.ca>

Subject: Multiklient Invest Newfoundland Offshore Seismic Program, 2018 to 2023

Good day all: Multiklient Invest (MKI) have submitted an amendment to the Environmental Assessment of Multiklient Invest Newfoundland Offshore Seismic Program, 2018-2023 (LGL Limited March 2018). The Amendment of Environmental Assessment of Multiklient Invest Newfoundland Seismic Program, 2018-2023 (LGL April 14 2021) has been submitted in support of MKI's request to test a modified activation procedure of the airguns, called eSeismic.

The C-NLOPB requests that you review the enclosed EA Amendment and provide comments no later than May 7, 2021. If no response is received from you by the date indicated above, the C-NLOPB will assume that you have no comments.

If you have any questions regarding the EA Amendment, you may contact me (dhicks@cnlopb.ca).

Regards Darren

Darren Hicks, M. Env. Sci.
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board

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