



Groundfish Enterprise Allocation Council

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April 23rd 2017

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

Dear Mr. Hicks:

We are submitting these comments based upon the request issued on March 21st for comments on the Multiklient Invest Newfoundland and Labrador Offshore Seismic Program, 2017 - 2026 Environmental Assessment.

To begin, we note that the study area encompasses virtually all of the regions fished by our membership in the offshore waters of NL. We feel that such a large spatial footprint for the project makes it all but impossible for us to assess the impacts of the project on our activities, as we do not know with any precision how the activities will be conducted relative to our harvesting activities. Given that the timing of the project activities are May 1st to November 30th, there will certainly be some overlap between our harvesting activities and potential seismic activity.

The relationship between seismic activity and the behavior of shrimp and groundfish is poorly understood. We have experienced substantial changes in catch rates and resource distribution associated with nearby seismic activity and feel that this EA does not adequately consider those risks. This is especially true given the broad nature of the study area and the reality that responses may differ in areas recently surveyed (e.g. southern areas) and those areas where this is the 'first' such activity (e.g. northern areas). A one-size-fits-all assessment may not be reasonable in this context.

The impact on fisheries VEC is very poorly described. From our perspective, any mitigation should include a spatial and temporal avoidance of harvesting activities that is based on a discussion between those operators on the water and the surveyor. We suggest that such mitigation is not discussed in this document, and should be considered.

As we have noted in other EAs, the document suggest that no fisher will be required to relocate based on the exploration activities. We question this conclusion, especially given that we have observed substantial reduction in catch rates of both shrimp and groundfish as a result of seismic testing within the general vicinity. This means that although a seismic survey vessel may not force us to immediately relocate to avoid the survey vessel, the resultant

impacts of fish distribution from the seismic pulses will cause us to significantly alter our fishing plans – even leading us to abandon some areas for several months. We request that the EA include some parameters on the avoidance of activity, to be determined through direct discussion with us. This avoidance should include both a spatial and temporal element to allow our harvesting activities to continue without reductions in catch rates.

We suggest that there is not sufficient information in this document to adequately assess the impacts of seismic exploration on shrimp and groundfish behavior and distribution (and thus the catch rates experienced by our operators). Without this information, we must proceed in a precautionary manner that respects existing ocean users while maintaining a path to allow exploration and resource development. We recommend that the CNLOPB disallow further seismic exploration programs until an agreement is reached between the regulators and industry on both sides of this issue on mitigation and further research.

We submit these comments based on our past experience with seismic exploration near our harvesting grounds. This experience has generally not been positive and we seek to improve our relationships with the oil and gas exploration industry such that the benefits of our oceans can benefit all sectors. We continue to ask that the CNLOPB increase their scrutiny of these seismic exploration programs to ensure that the interests of all harvesting sectors are respected.

Thank you for providing us with an opportunity to provide our input on this important process.

Sincerely,

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

Bruce Chapman
President

Cc: CAPP Members
GEAC Members