

From: Rowsell, Nicole <NicoleRowsell@gov.nl.ca>  
Sent: April 29, 2021 10:58 AM  
To: Hicks, Darren  
Cc: Tilley, Anna  
Subject: RE: Multiklient Invest Newfoundland Offshore Seismic Program, 2018 to 2023

Hi Darren,

The Sustainable Fisheries and Oceans Policy Division would like to provide the following observations and comments from a fisheries perspective.

In relation to the Amendment of Environmental Assessment of Multiklient Invest Newfoundland Offshore Seismic Program, 2018–2023:

- While estimated impacts of eSeismic activity is low, the amendment provides information only on the additional eSeismic activity. There will be conventional seismic exploration occurring alongside eSeismic, therefore risks assessment of both activities compounded remains of concern. The impact of executing both activities in succession was not addressed in this document.
- There is only one test of eSeismic mentioned. Has there only been one test completed in a true oceanic environment? Testing in Brazil did not report on the SEL over a full sequence of eSeismic pulses and over a 24-hour period. Data gaps remain.
- Many of the benefits of eSeismic remain speculation, with the document stating “systematic well-controlled studies of animal responses to eSeismic sounds are necessary before the relative behavioral responses from eSeismic and conventional seismic sources can be meaningfully compared.”
- Test location proposed overlaps with NAFO Division 3L; however, residual effects are predicted to be low to medium in magnitude for a duration of less than one month.
- Although there are low levels of interaction with the fishery expected, it is crucial that any activity or changes in activity be communicated effectively with industry representatives and harvesters on the water. Failure to do so has been known to cause losses to gear and catch, therefore damaging the profitability of the fishery and the wellbeing of harvesters.

Thank you for the opportunity to provide comments.

Nicole

Sustainable Fisheries and Oceans Policy  
Office: (709)729-0335

From: Hicks, Darren

Sent: Monday, April 26, 2021 10:34 AM

To: Kimberley Keats (Kimberley.keats@dfo-mpo.gc.ca) ; DFO Tracker (FPP-NL@dfo-mpo.gc.ca) ; Pulchan, Jerry [St. John's] ; Worthman, Sydney (EC) ; EC FCR Tracker (FCR\_Tracker@ec.gc.ca) ; Melissa Ginn (melissa.ginn@tc.gc.ca) ; Sara Rumbolt (sara.rumbolt@canada.ca) ; Diane Blanchard (diane.blanchard@canada.ca) ; CarolLee.Giffin@forces.gc.ca; 'Genest, Maximilien (NRCAN/RNCAN)' ; NRCan Tracker (NRCan.ea-spi-ee-isp.RNCan@canada.ca) ; Sweeney, Joanne ; Rowsell, Nicole ; Carter, Chris

Cc: Murphy, Ian

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@cnlopbc.ca).

Regards

Darren

Darren Hicks, M. Env. Sci.

Environmental Analyst

Canada-Newfoundland and Labrador Offshore Petroleum Board

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