



NUNATSIAVUT
kavamanga Government

Nunaligninikmik amma Nunamiutani
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,
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Canada-Newfoundland and Labrador Offshore Petroleum Board
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April 1, 2014

Re: Environmental Assessment MKI Labrador Sea Seismic Program 2014-2018

Dear Mr. Hicks,

Please find below our comments with respect to MKI's Labrador Sea Seismic Program 2014-2018 environmental assessment. It is important to take these comments in the context of our previous submissions and outstanding concerns to the C-NLOPB regarding seismic activity on the north coast of Labrador.

Inuit depend on the marine environment for a subsistence lifestyle and for their economic livelihood, particularly in regards to the Inuit Fishery. As is the case with all seismic activity, this program could potentially have negative impacts on Labrador Inuit health and wellbeing. The Nunatsiavut Government continuously recommends that seismic activities not begin prior to September 15 of each year and is adamant that seismic activities do not disrupt the fishery, irrespective of the seismic survey plan of MKI.

The Nunatsiavut Government recommends that adaptive management be required for Project-specific or cumulative effects, whether conducted by MKI, government bodies, or in combination. This would include the implementation of contingency plans and resources to enable responsive action, especially in areas where effect predictions are uncertain and where predictive errors may have serious consequences (e.g. disruption to traditional livelihoods or Inuit Fishery).

Currently, Labrador Inuit bear the majority of the risk associated with seismic activities with few tangible benefits to the region. The Nunatsiavut Government expects the

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Proponent to accept a degree of responsibility for any negative changes to the Inuit Fishery and subsistence fishing, and that the burden of proof would not rest on Inuit stakeholders to demonstrate a cause and effect relationship with seismic processes and the fisheries.

Hiring, training and ensuring meaningful employment for Labrador Inuit is essential. This could be established through an employment outreach program, with defined minimum targets for Labrador Inuit hiring. Such a program should include transportation assistance and measures to address social and cultural issues including any associated language barriers, if necessary. This would also include the establishment of paid trainee positions to be in place onboard the seismic vessel in order to build capacity. Furthermore, given that our Inuit fishers are not represented by the Fish, Food and Allied Workers Union, the Nunatsiavut Government is adamant that the Inuit Fisheries Liaison Officer be present on the seismic vessel at all times during the Project.

We also request that the Proponent support through on-going basis Nunatsiavut government businesses and service providers for the duration of their activity on the north coast of Labrador.

The Nunatsiavut Government recommends that an annual report be submitted to the CNLOPB and the Nunatsiavut Government no later than January 31, detailing the progress and potential environmental impacts of the Project, including progress on the implementation of mitigation measures and Inuit-specific opportunities.

Potential mitigation measures could still be arranged for the 2014 MKI seismic program and the Nunatsiavut Government recommends increased communication and consultation to address the ongoing concerns of Inuit in the region. Currently, few steps have been taken by the proponent to address the potential negative impacts of seismic activity within the Labrador Inuit Settlement Zone and Inuit Fishery.

Best regards,



Environmental Assessment Manager

cc., [REDACTED], Director of Non-Renewable Resources, Nunatsiavut Government

cc., [REDACTED], Director of Environment, Nunatsiavut Government