



**NUNATSIAVUT**  
kavamanga Government

Nunaligninikmik amma Nunamiutanik  
Ujaganik Imaniklu

Lands and Natural Resources

November 17, 2013

Darren Hicks, MES  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
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**RE: Multi Klient Invest AS Labrador Sea Seismic Program, 2014-2018,  
Commencement on Environmental Assessment**

Dear Mr. Hicks,

Please find below our comments with respect to Multi Klient Invest AS Labrador Sea Seismic Program as well as the identification of our specialists/experts.

The Nunatsiavut Government finds it unacceptable that we are not listed as an interested party to be consulted within the Project Description. Appropriate and meaningful consultation is necessary and expected. It is essential that Multi Klient Invest consult directly with the Nunatsiavut Government on the timing and location of areas of importance to Nunatsiavut fishers and any other fishing related issue. Furthermore, it is imperative that the Nunatsiavut Government be present and involved in any meeting that discusses the proposed project to the commercial fishing community. Recognizing and understanding the importance of the marine ecosystem to the health and wellbeing of Inuit is essential.

Given that the proposed seismic program is 5 years in length, including an expansion to intensive 3D data acquisition in coming years, the Nunatsiavut Government insists that meaningful in-person discussions take place with the proponent, university-based scientists and the C-NLOPB. This discussion should include, but not be limited to, seismic

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impacts on fishes, marine mammals and benthic inhabitants as well as a discussion of the risks and benefits of this work for the Inuit of Labrador.

Furthermore, the Nunatsiavut Government would like MKI to fund a research study, conducted by the Nunatsiavut Government, that investigates the impacts of seismic, in real-time, on catch rates of species important to Nunatsiavut fishers.

For information and knowledge from our specialist/experts, please contact myself directly, cc'ing [REDACTED] on all correspondence. We will either provided the necessary information or contact the appropriate knowledge holder:

[REDACTED]  
Environmental Assessment Manager  
Nunatsiavut Government

[REDACTED]  
Director of Environment  
Nunatsiavut Government

Sincerely,

[REDACTED]