

C-NLOPB Comments

General Comment

There are several occurrences of the author referencing future 3-D seismic programs. The proponent should be reminded that this is not in context with the project description and scope of the project.

MKI Response

Future 3-D seismic surveys refers to the 2012 and 2013 period under this program. Future surveys refers to consideration with respect to changes in socio-economic and ecological VECs. Future surveys also refers to other operators with respect to cumulative effects.

C-NLOPB Response

3-D seismic programs are not included in the assessment of activities proposed for 2012 and 2013. Also, the response to C-NLOPB's comment on Section 4.2.4 indicates that "only 2-D surveys, vessel presence, presence of cables and streamers, and accidental events are project activities included in the EA.

MKI Response

The MKI survey entails only a 2-D program from 2011 to 2013.

General Comment

Section 2.3.2.2 Logistical Support, Support Vessels, 2nd para.

Again, as per the Geophysical, Geological, Environmental and Geotechnical Program Guidelines (C-NLOPB) 2011), the use of a Fisheries Liaison Officer (FLO) onboard the seismic vessel is considered best practice.

MKI Response

Agreed that the guideline states the preference however it is not mandatory. There are circumstances that prevent the FLO or MMO or other personnel not essential to the operation of the vessel where the only physical space for accommodation is on the support vessel.

C-NLOPB Response

Understood. However, if space is available, would the first choice for the location of the FLO or MMO be the seismic vessel?

MKI Response

As of September 1 2011, the FLO is located on the seismic vessel and will remain there for this fall program.

Nunatsiavut Government Comments

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, the proponent should be required to consult with the Nunatsiavut Government on appropriate timeframes for conducting seismic exploration along various geographic regions of the Labrador coast. This would help ensure mitigation of effects on the Inuit fishery.

MKI Response

MKI will continue to consult with the Nunatsiavut Government on appropriate timeframes for conducting seismic exploration along various geographic regions of the Labrador coast.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, adaptive management for Project-specific or cumulative effects, whether conducted by MKI, governments, or in combination be required. 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 (eg. disruption to traditional livelihoods or Inuit fishery).

MKI Response

MKI would be willing to discuss and deal with disruption to traditional livelihoods or Inuit fishery should this be proven to occur.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, the concept of quantitative employment objectives or targets be established for Labrador Inuit. This should also include a specific target for Labrador Inuit that currently reside within the Labrador Inuit Settlement Area. This should be done in consultation with the Nunatsiavut Government and agreed upon by Labrador Inuit.

MKI Response

MKI would be willing to consult with Nunatsiavut Government to discuss this further.

MKI has held various community meetings and asked for candidates for a Inuit observer. We welcomed the opportunity for local Inuits and finally received a candidate that is joining the vessel on the next crew change on September 7, 2011 in St. John's, NF.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, an employment outreach program for Labrador Inuit be established. This would include a specific recruitment program, 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.

MKI Response

MKI has no comment.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, an annual report is submitted to the C-NLOPB and the Nunatsiavut Government no later than January 31 detailing the progress and potential environmental impacts of the Project, including progress on Inuit-specific opportunities implemented as mitigation measures.

MKI Response

MKI will provide Nunatsiavut Government with a copy of the FLO and MMO reports.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, MKI identify and allocate in its detailed Project budget, financial support for marine environmental management programs along the Labrador coast for the duration of the proposed Project.

MKI Response

This is a benefits issue.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, the C-NLOPB (or the Province and Federal Government) make long-term financial commitments to better understand the impacts of seismic surveys in 'real-world' settings along the Labrador coast. This would include funds to develop a better understanding of current physical and biological 'baseline' conditions along the coast of Labrador as well as a current understanding of the Inuit fishery. This on-going assessment/research program should be developed in consultation with Fisheries and Oceans Canada, independent third-party experts and Labrador Inuit. As much as possible (i.e. as capacity permits), the assessment should be carried out by Labrador Inuit.

MKI Response

This comment has been directed to C-NLOPB and MKI have no comment.

General Comment

The Nunatsiavut Government recommends that, should the project proceed and there are changes demonstrated from baseline conditions established through the above research program, the Proponent would accept a degree of responsibility for those changes and the burden of proof would not rest on stakeholders to demonstrate a cause and effect relationship.

MKI Response

Industry will be responsive to necessary mitigations as a result of any future research.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, MKI (in partnership with the C-NLOPB) be required to organize and fund a workshop with third-party facilitation and participation by stakeholder organizations, including Labrador Inuit and independent experts from academic or equivalent organizations to review and advise on a detailed draft seismic impacts monitoring program designed for the Labrador coast. This would include environmental specific impacts as well as impacts on the Inuit fishery.

MKI Response

MKI has no comment on this.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, the results of these assessments and research programs be published in peer-reviewed journals.

MKI Response

MKI would not have any objection to Research being published in peer review journals.

General Comment

The Nunatsiavut Government recommends that, if the Project is approved, a Labrador seismic monitoring and community liaison Committee be established. The C-NLOPB and relevant industry players should provide the Committee with sufficient resources to allow for staff support, expenses and a modest honorarium for non-government participants, acquisition of independent expert advice, and adequate communication with community residents including occasional public forums. The Committee would operate through the duration of seismic and oil and gas exploration programs along the coast of Labrador.

MKI Response

MKI have reviewed your comment and feel this is directed to benefits and government and have no comment.