

# Multi Klient Invest Offshore Labrador 2D Seismic Program 2011-2013 Environmental Assessment Amendment (CEAR # 11-01-59997)

## GENERAL COMMENTS

### Fisheries and Oceans Canada

It is recommended that the proponent contact DFO Science Research Vessel coordinator at (709) 772-2027 to get information on 2012 research vessel surveys for the Labrador Sea and Davis Strait.

### MKI Response

DFO has been contacted the above indicated number and MKI has been given a contact George Shepherd direct line (709) 772-0077, MKI has called Mr. Shepherd and left him a message and will continue to have discussions to gather information on 2012 research vessel surveys for the Labrador Sea and Davis Strait area.

## SPECIFIC COMMENTS

### Canada-Newfoundland and Labrador Offshore Petroleum Board

*Table 5.9 – Study Area Harvest by Species, June to November, 2005-2009.*

The numbers/totals in this table do not make sense when cross-referenced with the numbers in the associated Table 5.9 Average Study Area Harvest by Species, July to November in the Addendum submitted in June of 2011. One example, Table 5.9 in the amendment shows 1 ton of American Plaice harvested, but Table 5.9 in the addendum shows 1053 tons of American Plaice harvested. This is not possible. Please review all of these catch numbers and resubmit the table.

*Figure 5.23 – Harvest of Main Species within the Study Area, 2005-2009.*

The numbers/totals in this table do not make sense when cross-referenced with the numbers in the associated Table 5.21 Harvest of Main Species Within the Study Area, 2005 to 2009 in the Addendum submitted in June of 2011. One example, Table 5.23 in the amendment shows over 30,000 tons of Northern Shrimp harvested, but Table 5.21 in the addendum shows less than 30,000 tons of Northern Shrimp harvested. This is not possible. Please review all of these catch numbers and resubmit the table.

### MKI Response:

MKI have reviewed the tables submitted as part of the 2012 Amendment Report and the tables submitted as part of the 2011 Addendum Report with the following findings. Both of the referenced commercial fish data tables, submitted as part of the 2011 Addendum Report, used **KILOGRAM** units in reporting landed weight from the DFO database but mistakenly labeled the columns in **TONS** (imperial). The DFO now use **TONNES** (metric) to compare analysis reports as noted back in the 2011 comment period. The commercial fish information submitted as part of the 2012 Amendment Report is correct and was reported in **TONNES**.

*NB.* It should also be noted that the 2012 Amendment Report data includes one more month of data per year.

## **SPECIFIC COMMENTS**

### **Nunatsiavut Government (NG)**

#### **NG Comment:**

The Nunatsiavut Government is adamant that seismic activities do not disrupt the fishery, irrespective of the seismic survey plan of MKI.

#### **MKI Response:**

MKI can confirm that they will adopt a seismic survey acquisition plan that will not interfere with any fishing vessels active in the project area.

As last year, MKI's primary mitigation plan is avoidance. As discussed at the recent seismic workshop, provision of the locations of the main fishing areas for crab, shrimp and turbot would enable MKI to incorporate these into our acquisition plan. This would be used in conjunction with the VMS information supplied by FFAW.

All mitigation identified in the EA, will be followed during the course of the survey. As per the C-NLOPB letter dated Sept 8, 2011, during the operational stage(s) of the project, communication protocols will be in place via a combination of personnel resources, both onboard the vessel (Fisheries Liaison Observer, two Inuit Observers, the vessel Master/bridge crew and Party Chief) and onshore (Availability of a Single Point of Contact, supported by MKI project management personnel), all of which will form the basis of the communication program with Inuit fisheries to ensure no disruption to the Inuit fishery as a result of the seismic program.

All weekly status reports, including a description of all communications or interaction with fishers and their relevant organizations, including Inuit fishers and Nunatsiavut Government, in the preceding week will be provided to the C-NLOPB. This information can also be provided to a single point of contact within the Nunatsiavut Government.

#### **NG Comment:**

The Nunatsiavut Government requests that a thorough research effort be put forth to determine the impacts and effects of the seismic program on the Labrador Inuit Settlement Zone and Inuit fishery.

#### **MKI Response:**

The C-NLOPB noted in their letter to the Nunatsiavut Government dated Sept 8, 2011 that established research funds such as the Environmental Studies Research Funds (ESRF) is best suited to pursue environmental research that is not associated with a specific survey program. Some research of this type that was identified in the Labrador Shelf Strategic Environmental Assessment, was proposed to the ESRF, was funded, and is awaiting startup, with a working group led by a Nunatsiavut Government staff member overseeing the research.

This topic was actively discussed at the recent seismic workshop with contributions from the Nunatsiavut Government, C-NLOPB, DFO, and Operating Companies that were present. It was highlighted and recognized that research programs take both time to develop, implement and depending on the nature and scale of the research require

significant level of financial and resource commitment from multiple stakeholders over many years; hence, the focus on efforts through ESRF.

A review of available scientific knowledge was conducted as part of the EIA process. More practically it was highlighted that there were no known negative impacts as a result of the seismic program in 2011.

**NG Comment:**

The Nunatsiavut Government recognizes the training of 4 Inuit marine mammal observers for the future seismic work as a positive step forward by MKI. However, integration of the Inuit observations into the marine mammal observation data did not occur during the 2011 seismic survey. This lack of integration of the Inuit data is unacceptable and moving forward it is essential that the Inuit observations are included in future surveys by MKI.

**MKI Response:**

MKI can confirm that trained Inuit marine mammal observers will be engaged during the 2012 survey and their observations along with those of the other onboard MMO's will be integrated into the marine mammal observation data.

**NG Comment:**

In the future, the Nunatsiavut Government recommends that the proponent consult with the Nunatsiavut Government about the appropriate temporal and geographic scale of the seismic program to mitigate the effects on the Inuit fishery, prior to the amendment of the environmental assessment.

**MKI Response:**

MKI will make best efforts to consult with the Nunatsiavut Government prior to the submission of an amendment to the environmental assessment to mitigate the effects on the Inuit fishery of any future temporal or geographic changes to the project area.

**NG Comment:**

The Nunatsiavut Government state that best practises in relation to protection of marine mammals is expected.

**MKI Response:**

MKI can confirm that the requirements of the EA and the Canadian Statement of Practice will be followed in relation to protection of marine mammals.

**NG Comment:**

The Nunatsiavut Government recommends increased communication and consultation to address the ongoing concerns of Inuit in the region.

**MKI Response:**

MKI will make every effort to increase and improve communications with the Nunatsiavut Government to address the ongoing concerns of Inuit in the region. The recent seismic

workshop was a success in establishing links with members of the Nunatsiavut Government and this can form the basis for improved communications going forward.

In addition, MKI representatives travelled to Cartwright and Plum Point to hold additional Public Meetings with fisher's that were arranged by Sikimuit Environmental Management ahead of the 2012 survey.

Furthermore, following last year's Public Meetings MKI has made contact via email or post with all Stakeholders that attended the consultations in the communities in 2011 and sent them a copy of the Environmental Report produced from the survey last year.