

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

NG Comment

The Nunatsiavut Government will provide MKI with a contact that has access to the Maps identifying the locations of the main fishing areas of importance for crab, shrimp and turbot as well as the corresponding dates that those areas are to be avoided.

As discussed at the seismic workshop, the Inuit Fishers are not part of the FFAW and therefore, the location of our vessels will not be supplied by the FFAW. We recognize the importance of this communication for vessels under the FFAW, but for this same reason, having an Inuit Fisheries Liaison Officer is essential.

A single point contact for the weekly status reports will be the Rodd Laing (rodd_laing@nunatsiavut.com).

MKI Comment

Thank you for providing single point of contact details; this will be implemented into the circulation of the weekly report from the vessel.

The MKI contact is Gary Morrow (Gary.Morrow@pgs.com), Office: (281) 509-8000 or cell (832) 493 0342.

Please provide details of the contact so that MKI can obtain the maps identifying the locations of the main fishing areas of importance for crab, shrimp, and turbot prior to commencement of the survey.

NG Comment:

As discussed in the seismic workshop, the ESRF program is not the ideal research platform / program for the Nunatsiavut Government. While we do want to continue being a part of ESRF and future research programs with the fund, the program does not have Inuit priorities as the basis of the research. The Nunatsiavut Government will continue to work with all organizations (C-NLOPB, DFO and Operating Companies) to establish a research program that is more directly suited to our needs.

There has been no evidence highlighted by MKI to indicate a lack of negative impacts of the 2011 seismic program. The Nunatsiavut Government would like MKI to provide evidence to support the statement: "it was highlighted that there were no negative impacts as a result of the seismic program in 2011". As evidenced during the seismic workshop, some fishers from our region experienced a decrease in harvest immediately following the passing of the seismic vessel.

The Environmental Observations report does not show any evidence to support this claim. Quotas and landings are not a metric to account for effort. Therefore, a thorough study that includes Nunatsiavut fishers is necessary to attempt to determine the impacts of seismic on the fisheries within the region. There was discussion at the seismic workshop of an upcoming ESRF study to investigate catch per unit effort, but it was unclear if Nunatsiavut fishers would be included in the study. This is necessary, if the study takes place.

Finally, it is the proponent's responsibility to show, beyond reasonable doubt, that there are no negative impacts of seismic on the region. So far, there has been no Scientific evidence presented to the Nunatsiavut Government to show this lack of impact.

MKI Response

As the Nunatsiavut Government pointed out the topic of research programs was discussed at the recent Seismic Workshop, as well as being recognized by the C-NLOPB in their letter of September 8, 2011 to Nunatsiavut Government. MKI support the idea to establish a research program that is more directly suited to the needs of the Labrador Inuit and Nunatsiavut Government.

NG Comment

The Nunatsiavut Government would like a commitment from MKI that along with Standard Marine Mammal Observations that distance to animal be collected.

Also, the Nunatsiavut Government would like a commitment from MKI that when a marine mammal is unable to be clearly identified to the species level, and is within or on the edge of the mitigation zone, that the airguns will be shutdown.

MKI Response

MKI commits that the distance to the sighted animals will be collected. Sue Belford, with YOLO Environmental, will be attending the Sanco Spirit in Newfoundland on May 31, 2012 to meet with all the Marine Mammal Observers onboard the vessel prior to commencement of the program to re-affirm the procedures to be followed.

MKI as stated previously will follow the "Canadian Statement of Practice".

NG Comment

This is an area of high importance for the Nunatsiavut Government. If MKI is serious about having open and productive discussions with the Nunatsiavut Government, continuous consultation is necessary. The Nunatsiavut Government would like to see MKI work towards implementing the recommendations we put forth, rather than this process being solely a necessary step to starting seismic in our region. The significant amount of time and effort invested in this process are wasted if the concerns of Labrador Inuit are not taken seriously.

MKI Response

MKI recognizes the importance of good communication with the Nunatsiavut Government and will continue to make best efforts to build on the relationships established at the seismic workshop.