



**Nunatsiavut**  
kavamanga Government

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Lands and Natural Resources

September 5, 2011

Darren Hicks, MES  
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**Re: Comments on the Environmental Assessment addendum responses for the proposed Multi Klient Invest seismic survey program (2011-2013)**

Dear Mr. Hicks,

Please find below our comments with respect to the environmental assessment of Multi Klient Invest's seismic Program, 2011-2013. It is important to take these comments in the context of our previous submissions and outstanding concerns to the CNLOPB regarding this proposed project.

Although it has been firmly committed that no survey lines will enter the Labrador Inuit Settlement Zone, the extent of impact as a result of multiple survey lines just outside the Zone has not been rigorously demonstrated. With respect to extent of impacts, the Canadian Environmental Assessment Act and associated regulations stipulate that the burden of proof rests on the proponent to demonstrate the extent of impacts (or lack thereof) with high certainty. The extent of impact along the Labrador coast has not been established with high certainty, including effects within the Labrador Inuit Settlement Zone and effects on the Inuit fishery. Currently, there is no evidence provided by the proponent to explain the western boundary of impacts. Therefore, the exclusion of effects (with high certainty) on these areas is not possible.

Inuit depend upon the marine environment for a subsistence lifestyle (eg. travelling and harvesting of country foods) and an economic livelihood (eg. Inuit fishery). The

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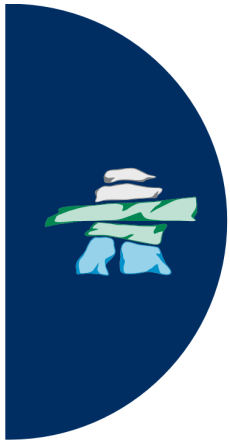
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Nunatsiavut Government has therefore determined that there is a potential of significant adverse effects on Labrador Inuit as a result of this broad (both temporal and geographic) proposed Project and several mitigation measures should be implemented.

MKI has stated that this is a long-term project. Knowing that there is a potential of significant adverse effects on Labrador Inuit for a long period of time, appropriate mitigation measures would include the following:

-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.

-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).

-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.

-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.

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-The Nunatsiavut Government recommends that, if the Project is approved, an annual report is 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 Inuit-specific opportunities implemented as mitigation measures.

-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.

-The Nunatsiavut Government recommends that, if the Project is approved, the CNLOPB (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.

-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.

-The Nunatsiavut Government recommends that, if the Project is approved, MKI (in partnership with the CNLOPB) 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.



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

-The Nunatsiavut Government recommends that, if the Project is approved, a Labrador seismic monitoring and community liaison Committee be established. The CNLOPB 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.

Although it is stated that there are no viable alternatives that can be considered from an environmental viewpoint, in our response, we have once again put forward several mitigation measures that will significantly improve the sustainability of the proposed project from an Inuit perspective.

Best regards,

Tom

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