

Nunatsiavut
kavamanga Government

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Nunamiutaniq Ujaganik Imaniklu
Lands and Natural Resources

May 10, 2012

Darren Hicks, MES
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**Re: Multi Klient Invest Offshore Labrador 2D Seismic Program 2011-2013
Environmental Assessment Amendment (CEAR # 11-01-59997)**

Dear Mr. Hicks,

Please find below our comments with respect to the amendments 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 C-NLOPB regarding this project.

The Nunatsiavut Government opposes the requested change in temporal scale of MKI's seismic program within the environmental assessment. Inuit depend on the marine environment for a subsistence lifestyle and an economic livelihood (Inuit Fishery), and this change has the potential to increase the negative impacts of seismic on Inuit. The proposed changes will now result in the MKI seismic program overlapping with the entirety of the Inuit fishery, especially for shrimp, crab and turbot. Therefore, the Nunatsiavut Government is adamant that seismic activities do not disrupt the fishery, irrespective of the seismic survey plan of MKI.

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. Currently, there has been no evidence provided by the proponent to explain the boundary of impacts with respect to the seismic survey proposed. The Nunatsiavut Government requests that a thorough research effort be put

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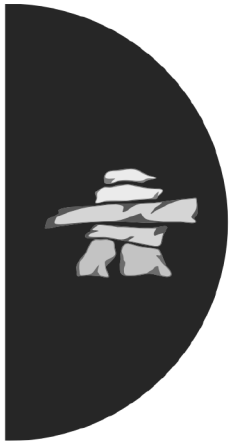
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forth to determine the impacts and effects of the seismic program on the Labrador Inuit Settlement Zone and Inuit fishery.

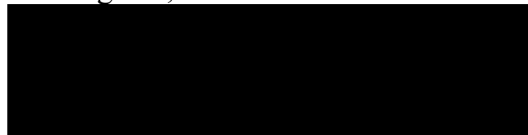
The Nunatsiavut Government recognizes the training of 4 Inuit marine mammal observers for the future seismic work as a positive step forward by MKI. However, integration of the Inuit observations into the marine mammal observation data did not occur during the 2011 seismic survey. This lack of integration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

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.

Additionally, the Nunatsiavut Government is disappointed with the lack of shutdown of the seismic source by MKI, despite the potential presence of a whale identified in the Species At Risk Act, on a few occasions during the 2011 seismic program. Best Practices in relation to protection of marine mammals is expected. Use of phrases such as “most likely” or “possibly” to describe observations indicate an unacceptable degree of uncertainty in the identification of the species in question. Any degree of uncertainty in species identification within the 500m safety zone should result in a source shutdown.

Potential mitigation measures could still be arranged for the 2012 MKI seismic program and the Nunatsiavut Government recommends increased communication and consultation to address the ongoing concerns of Inuit in the region. Currently, no steps have been taken by the proponent to address the potential negative impacts of seismic within the Labrador Inuit Settlement Zone and Inuit fishery.

Best regards,



Rodd Laing,
Environmental Assessment Manager

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