

Environmental Assessment of MKI's Southern Grand Banks Seismic Program, 2014-2018:
Amendment (LGL Limited January 2015)

Department of National Defence

MARLANT Safety and Environment (MARL SE) has the following comments:

- Please identify a specific individual or office to serve as a Point Of Contact (POC) for MARLANT queries and concerns;
- Please ensure the appropriate Notice to Mariners will be issued for all underwater activities and any significant surface ventures, such as use of flares, buoys, and unconventional night lighting;
- Please ensure the appropriate Notice to Airmen will be issued for all activities that could affect air safety, such as use of balloons, Unmanned Aerial Vehicles (UAVs) or tethered airborne devices; and
- Please ensure engagement of CTF 84, through Director General Naval Strategic Readiness (DGNSR), to ensure de-confliction with possible Allied submarine activities.

Canada Nova Scotia Offshore Petroleum Board

Any fisheries originating out of NS that could be impacted (possibly fisheries in the Sydney Basin/Banquereau Bank areas) should be made aware of the project and appropriately consulted.

FFAW/Unifor

The document suggests that attempting to “avoid high concentrations of fishing vessels to the greatest extent possible” is an acceptable mitigation. FFAW-Unifor maintains now, as was done last year in the full Environmental Assessment (EA) process, that avoidance of active fishing grounds is paramount. In a similar line of thought from last year's process, science is also to be avoided. “Avoidance to the greatest extent possible” is not sufficiently committed language. Further, there has to be differentiation in the fisheries science activities, as was indicated in previous submissions. The text suggests that 3-D Seismic activity does have a greater challenge of mitigation and intensity of exposure, yet there is no mention of this being re-evaluated in the considerations for the Valued Environmental Components.

Notwithstanding the above, it is evident that the “Amendment to the Environmental Assessment of MKI's Southern Grand Banks Seismic Program, 2014-2018” does not address the outstanding issues from the original Environmental Assessment process. By including 3-D it is ever more important to avoid fishing grounds, as the increased exposure and number of streamers will result in challenges in maneuverability and chances of encountering gear in the water.