



NUNATSIAVUT
kavamanga Government

Nunaligninikmik amma Nunamiutanik
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,
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April 29, 2016

**Re: Amendment to the Environmental Assessment of MKI's AS Southern Grand Banks
Seismic Program 2014-2018**

Dear Mr. Hicks,

Please find below our comments with respect to MKI's proposed amendments to the Labrador Sea Seismic Program 2014-2018 environmental assessment. It is important to take these comments in the context of our previous submissions and outstanding concerns to the C-NLOPB regarding seismic activity on the north coast of Labrador.

The Nunatsiavut Government does not agree nor support the proposed amendments to the text in Subsections 2.2 and 5.6.2.3 of the Environmental Assessment (EA) in relation to the Inuit personnel as Fisheries Liaison Officers (FLO) and Marine Mammal Observers (MMOs). Both of these sections were included as a result of negotiations through in-person consultations with Multi Klient Invest (MKI), where the importance of building capacity and training for Inuit was recognized. These sections were negotiated in good faith and the Nunatsiavut Government expects the Proponent to meet the terms of these sections in the EA.

Additionally, the rationale given by the Proponent for modifying Subsections 2.2 and 5.6.2.3 cannot be justified. At the yearly consultations with MKI, it has been suggested that additional Inuit be trained by the Proponent for the FLO and MMO positions, to ensure that the obligations of the EA could be met for the duration of the project. These recommendations have also been suggested in the majority of the Nunatsiavut Government's responses to the CNLOPB on all projects from this Proponent. Furthermore, to suggest that Inuit would not be familiar with the

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waters on the South Grand Banks Project Area is completely inaccurate. Inuit depend on the marine environment for a subsistence lifestyle and for their economic livelihood. Inuit are excellent observers of the environment, have extensive knowledge of the marine ecosystem and therefore would be able to function in the Southern Grand Banks, which was recognized in the in-person consultations that led to these sections being included in the Environmental Assessment.

Best regards,



Research Manager

cc., [REDACTED] Director of Non-Renewable Resources, Nunatsiavut Government