

Nexen Energy ULC Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Program (2018 – 2027) Environmental Assessment Addendum (Revised) (Amec Foster Wheeler May 2018)

GENERAL COMMENTS

Groundfish Enterprise Allocation Council-Canadian Association of Prawn Producers (GEAC-CAPP)

It is unfortunate that the addendum did not provide any novel information to help put our members' concerns at ease. The response again points to the original assessment which we have already suggested was inadequate in content to be able to appropriately and rigorously assess the potential impacts of the exploration activity.

Furthermore, we suggest that the assessment of 'effects' was not balanced. Peer-reviewed research has made it abundantly clear that the levels of energy generated by marine seismic exploration can have profound impacts on the behaviour and survival of many components of the marine ecosystem. We contend that insufficient effort has been expended to say with confidence that the effects are truly 'short-term' and 'localized'. The experience of our members has demonstrated otherwise.

Our concerns continue to be marginalized as described by the following response from Nexen '**The EA Study Team does not consider, for example, that the presence of seismic sound energy in the marine environment as a result of this Project and any associated (localized and short term) implications for individual fish behaviours (avoidance) is likely to have a detectable effect upon the overall fishing industry in the Study Area.**'. It is clear that Nexen has no real intention to consider our concerns given they believe, without the benefit of evidence or experience, that our position is without merit.

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Fish, Food and Allied Workers (FFAW)

We maintain our position that seismic activity impacts catch rates and has a resultant/detectable effect upon the economics of the fishing industry. Any change in fishing pattern/activity is a realized economic impact to harvesters. Research in this area has been extremely challenging to initiate. Whether this specific project will impact the industry will be highly dependent on commercial fishing activities taking place at finite times (i.e. seasons) in finite spaces (i.e. fishing areas) and the specific areas of interest to Nexen Energy in any given year (2018-2027).

For this reason it is critical that Nexen commit to planning with the fishing industry several months prior to the start of any seismic work in any given year of planned activities in NL waters. Our experience with new proponents to NL waters is that this “planning ahead” step is skipped and there is a heavy reliance on the FLO for planning, as this document suggests. The FLO will not be engaged in the process until the exploration activity begins on the water, that is, through actual marine activity. This is too late to change work plans.

As a minor point, although it was noted in other sections of the document, the FLO should be the primary individual to communicate with active fish harvesters, not the standby or guard vessel (Page 6, fourth point).

We look forward to further direct communication with the proponent as this EA approval/authorization process evolves.