



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

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March 29, 2018

Darren Hicks

Canada-Newfoundland and Labrador Offshore Petroleum Board

5th Floor, TD Place

140 Water Street

St. John's, NL A1C 6H6

Mr. Hicks,

Thank you for providing Nexen Energy ULC's response to the concerns raised by our submission on the *Environmental Assessment Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Program (2018-2027)*.

To begin, we were disappointed by the tone of their response, which does little to promote a "common interest" relationship between our respective industries involved in offshore waters off Newfoundland and Labrador.

The spatial extent of the program precludes the broadly stated impact assessment presented by the EA and this addendum. We suspect that if we were to identify a specific point within the study area, Nexen would be unable to provide any precision on the actual 'values' contained therein (ranging from phytoplankton to larval fish and extending to top predators), because of the paucity of information that is available on a local scale. With such limited information, "likelihoods" cannot be legitimately claimed.

Given that knowledge about seismic impacts is also very limited, we suggest there is insufficient information to be able to legitimately claim "no likely impact". One only has to conduct a quick literature scan to realize that localized impacts to the food web can be extremely significant. Multiply this potential effect across the entire study area and more questions than answers emerge.

We must take issue with the following statement in the addendum: *"In particular, it is unlikely that any such behavioural effects would result in any "detectable reduction in the overall economic returns generated from fisheries and/or other marine activities undertaken within the Study Area over one or more years" (Section 5.9.1)".* In the experience of our member companies, seismic activity has indeed forced the displacement of vessels from otherwise productive fishing grounds, for weeks if not months at a time, severely reducing their economic performance. Nexen's decision to make such a statement erodes faith that the overall assessment is complete, and suggests that further refinement is necessary prior to permitting any activity.

We must also make mention of the FLO offered by Nexen. Our concern is not with a seismic vessel 'meeting' or 'sighting' our vessels, but that our actual fishing results may

be disrupted by seismic operations in the general vicinity. This understanding appears to have been lost, and we would suggest that Nexen has either not considered our concerns or has simply deflected them. Either is most troubling. We suggest that a standardized impact avoidance protocol be negotiated between Nexen and fishing companies who will be operating in the same vicinity.

We reiterate our belief that the precautionary approach is not being followed here, and that significant work must be done to gain the trust of the year-round harvesting sector, prior to seismic activity being undertaken in areas that have provided valuable and sustainable economic contributions to this sector of the fishing industry.

We thank you again for allowing us this opportunity to respond to the addendum document.

Sincerely,

A solid black rectangular redaction box covering the signature of Bruce Chapman.

Bruce Chapman
Executive Director – CAPP
President – GEAC