



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

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June 7, 2018

Darren Hicks
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6

Dear Mr. Hicks:

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

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.

We continue to take the position that a precautionary approach has not been taken on this (and other) seismic exploration programs and this should be rectified prior to

permitting wholesale exploration of areas with little understanding of the long-term impacts of the activity.

In closing, we do appreciate that Nexen has committed to liaise with industry participants harvesting resources in the study area, however we continue to stress a need for a standardized avoidance protocol to be developed and applied to all operators to ensure that the pre-existing harvesting activities undertaken in these productive waters can continue unimpacted in light of the incredible increase in seismic exploration planned in the next several years by Nexen and others.

Sincerely,

A solid black rectangular box redacting the signature of Bruce Chapman.

Bruce Chapman
Executive Director – CAPP
President – GEAC