



CANADIAN ASSOCIATION OF PRAWN PRODUCERS

1362 Revell Drive, Manotick, Ontario, K4M 1K8 · Tel: (613) 692-8249 Fax: (613) 692-8250

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

August 6th 2017

Mr. Hicks,

We are submitting these comments based upon the request issued for the Nexxen Energy ULC Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Program (2018 - 2027).

To begin, this project is situated in a highly productive region of the Northwest Atlantic. The boundaries of the study area encompass very important Groundfish harvesting areas for a wide variety of species. Although this is acknowledged in the Environmental Assessment document, we are concerned that the potential impacts of invasive surveying techniques such as seismic exploration are not adequately assessed, nor is the long term risk truly considered.

As we have indicated in past submissions on seismic exploration, the relationship between seismic activity and the behavior of shrimp and Groundfish is poorly understood. We have experienced substantial changes in catch rates and resource distribution associated with nearby seismic activity and feel that this EA does not adequately consider those risks. The study area encompasses many different marine environments and fisheries, but the assessment is narrowly focused and returns with the assessment of 'negligible to low' risk on fish species, fisheries and their habitats. This is clearly an over-extension of assessment given the paucity of scientific knowledge on the impacts of such intrusive activities.

As we have noted in other EAs, the document suggest that no fisher will be required to relocate based on the exploration activities. We question this conclusion, especially given that we have observed substantial reduction in catch rates of both shrimp and Groundfish as a result of seismic testing within the general vicinity. This means that although a seismic survey vessel may not force us to immediately relocate to avoid the survey vessel, the resultant impacts of fish distribution from the seismic pulses will cause us to significantly alter our fishing plans – even leading us to abandon some areas for several months.

We again request that the EA include some parameters on the avoidance of activity, to be determined through direct discussion with ourselves and member companies. This avoidance should include both a spatial and temporal element to allow our harvesting activities to continue without reductions in catch rates.

We suggest that there is not sufficient information in this document to adequately assess the impacts of seismic exploration on shrimp and Groundfish behavior and distribution (and thus the catch rates experienced by our operators). Without this information, we must proceed in a precautionary manner that respects existing ocean users while maintaining a path to allow exploration and resource development. We again recommend that the CNLOPB disallow further seismic exploration programs until an agreement is reached between the regulators and industry on both sides of this issue on mitigation and further research.

We submit these comments based on our past experience with seismic exploration near our harvesting grounds. This experience has generally not been positive and we seek to improve our relationships with the oil and gas exploration industry such that the benefits of our oceans can benefit all sectors. We continue to ask that the CNLOPB increase their scrutiny of these seismic exploration programs to ensure that the interests of all harvesting sectors are respected.

Thank you for providing us with an opportunity to provide our input on this important process.

Sincerely,

A solid black rectangular box used to redact the signature of Bruce Chapman.

Bruce Chapman
Executive Director – CAPP
President – GEAC

Cc: GEAC Membership
CAPP Membership