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April 17, 2007

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MD-30376

Ms. Kim Coady
Environmental Assessment Officer
Fifth Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6

RECEIVED
Canada-Newfoundland and Labrador
Petroleum Program

RE: **Jeanne d'Arc Basin 3-D Seismic Program Environmental Assessment
(CEAR 06-01-17492)**

Dear Ms. Coady:

This department has reviewed the Environmental Assessment (EA) for the Jeanne d'Arc Basin 3-D Seismic Program, and we offer the following comments:

- The EA presented by LGL addresses concerns related to fish health, commercial species, sensitive habitat, species at risk and residual and cumulative effects. Your recognition of SARA and work by the FRCC is impressive. It is also pleasing that you have consulted with relevant fisheries groups and other federal agencies. We are pleased that you have added recommendations of the FFAW to improve communications through the "Union Forum".
- Studies on seismic effects to fish species are mentioned for Australian waters and for tropical species. The more relevant studies to Newfoundland and Labrador waters are those in Norway and Scotland where there are similarities in fish species and water temperature. Another area where research on interactions between the environment and offshore oil and gas activity is available is in the North Sea. This research, which is extensive, would also add value to this and future EAs.
- Again, with this seismic environmental assessment it is concluded that mortality and acute physical effects would only occur within 1-5m of the seismic array. However, there is conflicting evidence of behavioral and catchability responses. Only resilient species such as Atlantic cod, snow crab and American plaice have been considered. Other species such as pelagics may not show similar effects and therefore should be considered.
- It is noted that there is a knowledge gap for behavioral effects, as well as effects to productivity and development of larvae for important commercial species. More long-term studies should be encouraged to fill this gap for Newfoundland and Labrador conditions.

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Thank you for the opportunity to comment on this environmental assessment.

Sincerely,

A handwritten signature in blue ink that reads "PJ Shea".

Patrick J. Shea, M.A.Sc.
Senior Policy Analyst

/For:
Tom Dooley, Director
Sustainable Fisheries Resources & Ocean Policy Division

Cc: Tom Dooley