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Tuesday, March 22, 2016

Darren Hicks
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Re: Environmental Assessment of Seitel's East Coast Offshore Seismic Program, 2016-2025

Darren,

Thank you for the opportunity to review and comment on the Environmental Assessment of CGG's Newfoundland Offshore Seismic Program, 2016-2025. As noted in previous EA reviews, the timing of the activity coincides with the highest harvesting activity of our Membership. Outside of this concern, we have identified a number of other areas in the document that require attention:

p. 62-5: The incorrect convention for NAFO areas is prevalent throughout these pages. For example, the second paragraph on page 62 should read, "2GHJ3KLMNOPs". Similarly, in the second paragraph of page 63 the same system should be utilized. The same error is evident throughout page 63-5, including in section 4.3.2 and in 4.3.3.1, and also in the description of Figure 4.2

p. 91: The same issue can be found here and the sentence should read, "The Innu Nation of Labrador holds a CCFL for fixed gear groundfish fishing activity within NAFO Divisions 3LMNOPs"

pp. 103; 105 Same issue – should read, "2J3KLNOPs," on page 103; on page 105, second line, should be 3Ps, not 4Ps.

p. 146: FFAW/Unifor should be used consistently

p. 156-7: "In the case of eggs and larvae, it is likely that the numbers negatively affected by exposure to seismic sound would be negligible when compared to those succumbing to natural mortality," is a very strong statement to make. It is noted that LGL identifies and acknowledges the data gaps existent in this base of knowledge and that "available experimental data suggest that there may be physical impacts on the fertilized eggs of snow crab and on the egg, larval,



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juvenile and adult stages of cod at very close range." Therefore, the former statement is problematic as a sound knowledge set to back the statement up is lacking. Likewise, stating that spatial and temporal avoidance of key life stages, as well as ramp-up procedures, should mitigate these effects is unsatisfactory when we do not know the effects of seismic activity on these species.

Similarly, the sentence that, "Limited data regarding physiological impacts on fish and invertebrates indicate that these impacts are both short-term and most obvious after exposure at close range," states the key issue – "limited data." Until a more thorough examination has been made and conclusions have been agreed upon we cannot be sure that effects are indeed short-term.

p. 163 "While some of the behavioural effects studies report decreases in catch rates near seismic survey areas, there is some disagreement on the duration and geographical extent of the effect," highlights one of our key concerns with seismic activity in commercial fish harvesting areas. As there has not yet been agreement on the effects of seismic on catch rates we reiterate that activity should not occur when harvesting is taking place, nor during key research times

A-2/A3: We would like to once again stand by our Membership in that the southernmost potential area for survey, including the Carson Canyon, are to be avoided by seismic activity as these are very important snow crab harvesting grounds. Members in attendance at consultation stressed that they will not allow seismic activity in these areas and we are supportive of this stance

A-7: Johan Joensen is incorrectly identified as Petroleum Industry Liaison. Robyn Lee was the Petroleum Industry Liaison at time of consultation, not Johan Joensen as identified.

Thank you for the opportunity to review this EA. Should you have any questions please do not hesitate to contact me.

Regards,


Projects Coordinator/Petroleum Industry Liaison
