



**NUNATSIAVUT**  
kavamanga Government

Nunaligninikmik amma Nunamiutani  
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,  
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Canada-Newfoundland and Labrador Offshore Petroleum Board  
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May 12, 2014

**Re: Environmental Assessment Report of TGS-NOPEC Seafloor and Seep Sampling Program – Labrador Offshore to Jeanne d’Arc Basin (2014 to 2019)**

Dear Mr. Hicks,

Please find below our comments with respect to TGS-NOPEC’s Seafloor and Seep Sampling Program 2014-2019 environmental assessment report. It is important to take these comments in the context of our previous submissions and outstanding concerns to the C-NLOPB regarding seismic activity on the north coast of Labrador.

Inuit depend on the marine environment for a subsistence lifestyle and for their economic livelihood, particularly in regards to the Inuit Fishery. The scope of this program could potentially have negative impacts on Labrador Inuit health and wellbeing. The Nunatsiavut Government is adamant that all activities associated with this program do not disrupt the fishery, irrespective of the survey plan of TGS-NOPEC.

The sub-bottom profiler described in the EA report by the Proponent primarily operates in a high frequency bandwidth of 90 to 115 kHz with an intensity level of ~228 dB measured 1m from the energy source. This intensity level is in excess of the recommended guidelines for impulse sounds by the National Marine Fisheries Service (NOAA, 2010) of 180 dB for marine mammals and 190 dB for pinnipeds. This same document also notes that recent workshops on acoustic disturbance recommend that a precautionary approach be taken with marine mammals and disturbance. Furthermore, section 19.1(d) of the *Canadian Environmental Assessment Act (2012)* states “mitigation measures that are technically and

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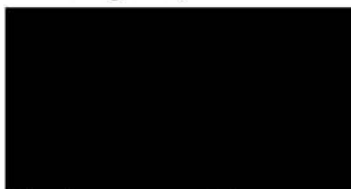
economically feasible and that would mitigate any significant adverse environmental effects of the designated project” should be considered. Therefore, the Department of Fisheries and Oceans *Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment* should apply, including the safety zone of 500m when the sub-bottom profiler is operating. As a result of this, having Marine Mammal Observers (MMO) onboard the vessel would be essential and necessary, and the Nunatsiavut Government recommends at least one of the MMOs be Inuit.

The Nunatsiavut Government recommends that adaptive management be required for Project-specific or cumulative effects, whether conducted by TGS-NOPEC, government bodies, or in combination. This would include the implementation of contingency plans and resources to enable responsive action, especially in areas where effect predictions are uncertain and where predictive errors may have serious consequences (e.g. disruption to traditional livelihoods or Inuit Fishery).

Hiring, training and ensuring meaningful employment for Labrador Inuit is essential. This could be established through an employment outreach program, with defined minimum targets for Labrador Inuit hiring. Such a program should include transportation assistance and measures to address social and cultural issues including any associated language barriers, if necessary. This would also include the establishment of paid trainee positions to be in place onboard the seismic vessel in order to build capacity. Furthermore, given that our Inuit fishers are not represented by the Fish, Food and Allied Workers Union, the Nunatsiavut Government is adamant that the Inuit Fisheries Liaison Officer be present on the seismic vessel at all times during the Project. We appreciate the proponent’s initial interest in ensuring NG has an FLO on board and look forward to working with them to ensure that this is implemented for the 2014 season. We also request that the Proponent support, through an on-going basis, Nunatsiavut government businesses and service providers for the duration of their activity on the north coast of Labrador.

The Nunatsiavut Government recommends that an annual report be submitted to the CNLOPB and the Nunatsiavut Government no later than January 31, detailing the progress and potential environmental impacts of the Project, including progress on the implementation of mitigation measures and Inuit-specific opportunities.

Best regards,



Environmental Assessment Manager

cc., [REDACTED] Director of Non-Renewable Resources, Nunatsiavut Government

cc., [REDACTED] Director of Environment, Nunatsiavut Government