



**NUNATSIAVUT**  
kavamanga Government

Nunaliginikmik amma Nunamiutanic  
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,  
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July 15, 2014

**Re: EA Addendum 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 EA Addendum and responses to some of our EA report comments.

The Nunatsiavut Government believes that the original concern related to the impacts of the sub-bottom profiler and proposed mitigation measure was not adequately addressed. As defined in our original submission dated May 9, 2014:

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 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*

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*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 response from the proponent provided insufficient concern and consideration to the potential impacts and proposed mitigation measure. Furthermore, no explanation or reference to evidence was provided to diminish our concerns related to acoustic disturbance from the sub-bottom profiler on marine mammals.

Therefore, the Nunatsiavut Government requests that the C-NLOPB require the proponent to adhere to the original recommendation of applying a safety zone of 500m when the sub-bottom profiler is operating. Such a measure would necessitate the use of MMOs. If this request is denied, the Nunatsiavut Government requires an explanation as to how the impacts of the SBP do not warrant the same mitigation measure as those used by compressed air guns.

Best regards,



Environmental Assessment Manager

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