



**NUNATSIAVUT**  
kavamanga Government

Nunaligninikmik amma Nunamiutanik  
Ujaganik Imaniklu

Lands and Natural Resources

February 27, 2014

Darren Hicks, MES  
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**RE: TGS-NOPEC Geophysical Company ASA Offshore Labrador Seafloor and Seep Sampling Program 2014-2019 Commencement of Environmental Assessment**

Dear Mr. Hicks,

Please find below our comments with respect to TGS-NOPEC Geophysical Company ASA Offshore Seafloor and Seep Sampling program as well as the identification of our specialists/experts.

The Nunatsiavut Government has two primary concerns related to this proposal. Firstly, the proponent fails to recognize and acknowledge that Nunatsiavut based fishers are not represented by the Fish, Food and Allied Workers (FFAW). It is essential that TGS-NOPEC Geophysical Company consult directly with the Nunatsiavut Government on the timing and location of areas of importance to Nunatsiavut fishers and any other fishing related issues. Secondly, it is imperative that the Nunatsiavut Government be present and involved in the meeting with the FFAW and One Ocean to discuss the proposed project to the commercial fishing community. Recognizing and understanding the importance of the marine ecosystem to the health and wellbeing of Inuit is essential.

These concerns have been expressed during previous submissions to the C-NLOPB, including our August 29, 2013 letter regarding the **Nalcor Energy Oil and Gas Geochemical Data Acquisition and Seabed Sample Survey** program. Although the TGS-

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NOPEC program is different, the proposed activities are incredibly similar, and therefore our previous concerns are applicable. The Nunatsiavut Government is disappointed that these comments and concerns have not yet been acted on, and considers a lack of response to the comments unsatisfactory, especially in light of the consultation obligations of the Crown as established through the Labrador Inuit Land Claims Agreement. We hope that this submission will receive a positive response from the C-NLOPB and TGS-NOPEC and are willing to work with the proponent and the C-NLOPB to put the measures in place.

For information and knowledge from our specialist/experts, please contact myself directly, cc'ing Tom Sheldon on all correspondence. We will either provide the necessary information or contact the appropriate knowledge holder:

  
Environmental Assessment Manager  
Nunatsiavut Government

  
Director of Environment  
Nunatsiavut Government

Sincerely,

