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Monday, March 21, 2016

Darren Hicks
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Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
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Re: Environmental Assessment of CGG's Newfoundland 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. 60-3: In the final paragraph of this page, the correct convention for the areas would be NAFO Divisions 3KLMNOPs and 4Vs. Similarly, in the second last paragraph of page 61 the same system should be utilized, 3KLMNOPs. The same error is evident throughout page 62, including in section 4.3.2 and in 4.3.3.1, and also in the description of Figure 4.2 on page 63

p. 85: 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"

p. 143: "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, 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



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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.

A-7: Johan Joensen and Robyn Lee are identified as participants in consultation from our organization. Robyn Lee was the Petroleum Industry Liaison at time of consultation, not Johan Joensen as identified. Also, I, Dwan Street, was also present in consultation.

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

Regards,

Dwan K. Street
Projects Coordinator/Petroleum Industry Liaison
