

MKI Labrador Offshore Seismic Program, 2026-2030 - DFO Comments

Project Description

The Study Area overlaps marine conservation areas in the Newfoundland and Labrador Region, including: Northeast Newfoundland Slope Other Effective Area-Based Conservation Measure (OECM), Hawke Channel OECM, Hopedale Saddle OECM, and Hatton Basin Marine Refuge. Suggest adding these marine conservation areas to a map of the Study Area in the Environmental Assessment (EA) Report. Based on Figure 1.1, it is unclear whether the Gilbert Bay Marine Protected Area (MPA) overlaps with the Study Area. Oil and gas seismic activities are prohibited within the Gilbert Bay MPA, and activities are assessed on a case-by-case basis for OECMs. Also, the Project Description (PD) lacks a discussion on Figure 1.1.

Additional information regarding the ocean bottom nodes should be provided in the EA report, such as:

- the locations of node placement;
- further refined numbers on how many nodes will be deployed;
- the PD discusses the shotpoint interval of one array pulse every 12.5 m, 18.75 m or 25 m. How will intervals work for the ocean bottom nodes?;
- the PD states that the ocean bottom nodes can be left unattended for up to 100-150 days. Will there be monitoring (e.g. Marine Mammal Observer, PAM) during use of nodes?;
- a detailed description of the potential impacts of ocean bottom nodes on the Valued Components; and
- based on a previous discussion with the proponent (November 2024), DFO is of the understanding that since a ROV will be used for ocean bottom node deployment, node locations can be altered to avoid corals and sponges. The EA report should include a commitment to avoid sensitive benthic habitat, such as corals and sponges, during deployment of ocean bottom nodes.

Section 2.3: Mitigation and Monitoring for Marine Mammals, Sea Turtles and Seabirds. Since there are components of the project with a benthic footprint, the Mitigation and Monitoring section should also include benthic habitat (e.g. corals and sponges).

The EA report should include a commitment to adhere to the *Statement of Canadian Practice with respect to Mitigation of Seismic Sound in the Marine Environment*.

The EA report should include a detailed description of how the "Gemini" configuration may differently impact the Valued Components, in comparison to standard configurations.

Draft Scoping Document

Page 7 lists sensitive areas in the Study Area to be the Northeast Newfoundland Slope Closure, the Division 30 Coral Closure, the Laurentian Channel Marine Protected Area, and the Funk Island Deep Closure. See DFO comment above regarding the marine conservation areas that overlap the Study Area: Northeast Newfoundland Slope OECM, Hawke Channel OECM, Hopedale Saddle OECM, and Hatton Basin Marine Refuge. It is unclear whether the Gilbert Bay MPA overlaps with the Study Area.

In addition to Presence of Seismic Survey Vessels (Section 5.2.10), Section 5.2 should also include potential presence of ocean bottom nodes.