

Colleen Garber

From: Eric Theriault
Sent: Tuesday, March 05, 2013 9:19 AM
To: Document Control
Subject: FW: EAC Comments on Addendum
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Eric Theriault, M.A.Sc., P.Eng.
Advisor, Environmental Affairs

Canada-Nova Scotia Offshore Petroleum Board
1791 Barrington Street
6th Floor, TD Centre
Halifax, NS, B3J 3K9

Direct (902) 496-0742
Reception (902) 422-5588
Fax (902) 422-1799

etheriault@cnsopb.ns.ca

<http://www.cnsopb.ns.ca>

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From: Mark Butler [<mailto:action@ecologyaction.ca>]
Sent: March-04-13 11:28 PM
To: Stuart Pinks; Elizabeth MacDonald; Eric Theriault
Subject: EAC Comments on Addendum

Please find attached comments from the Ecology Action Centre

4 March, 2013

Dear Mr. Pinks

Re: Addendum to Environmental Assessment of Shell Canada Ltd's Shelburne Basin 3-D Seismic Survey

As has been noted by DFO in its comments, our concerns about the original survey area apply equally to the expanded survey area. Principally, we are concerned about the timing and duration of the proposed seismic survey because of its impact on migrating marine life.

Knowledge about the impacts of seismic blasting on marine life is extremely limited. Research has shown that the firing of air guns can have behavioural, sub-lethal and lethal impacts on invertebrates, fish, marine mammals and reptiles. Given the range of species affected, the ranges of impacts, the inaccessibility of the marine environment, and the gaps in our knowledge it is difficult to mitigate the impacts of seismic blasting, particularly a survey that may last up to four months in an area rich in marine life.

Short of cancelling a survey, the next most effective mitigation measure is to place seasonal restrictions on surveys so as to minimize impacts on migrating marine life. This was one of the mitigation measures identified in the Strategic Environment Assessment (SEA) report commissioned by the Board in 2011 for the SW Scotian Slope area which encompasses the Shell lease blocks (Section 7.4, Table 17 <http://www.cnsopb.ns.ca/environment/environmental-assessments/public-registry/file-no-753456>). We have reviewed the Board's response to the draft EA issued on February 20, 2013 and would encourage the Board to request further that the April start of the survey be delayed.

We look forward to meeting with representatives of the CNSOPB and Shell on Thursday, March 7th to discuss these matters further.

We would also like to repeat our request that our second letter of February 14, 2013 to the CNSOPB be posted to the EA registry.

Sincerely,

Mark Butler