

Optional Comments Tracking Form

Comment Number	Reference to EIS (Section and page)	Context and Rationale	Specific Question/ Request for Information
<p><i>e.g. #1</i></p>	<p><i>Identify which section(s) of the EIS Summary and appendices are related to the comment (Volume, section, page number).</i></p> <p><i>e.g. page 78, section 6.6.1 fish and fish habitat</i></p>	<p><i>Provide applicable background or rationale for requesting the information and why it is important for understanding the effects of the Project or for developing a follow-up program to verify the accuracy of EA predictions or the effectiveness of mitigation measures</i></p> <p><i>e.g. Seasonal fishing practices are both an important source of country foods and an important cultural practice. Although the potential effects to fish species during the operation of the Project have been adequately described, the potential long-term effects to fish species during and following well abandonment is not clear.</i></p>	<p><i>Ask a specific question, or request specific additional information or clarification.</i></p> <p><i>e.g. Describe the long-term effects to fish and fish habitat during and after well abandonment. Consider how fish use of the area might change, as well as potential tainting of the country food. Update any associated conclusions accordingly.</i></p>
<p>1</p>	<p>-Section 2.3 Accidental Events. -Chapter 6, in general.</p>	<p>The EIS Summary acknowledges a high probability of batch spills (0.42 per well-year). The assessment of potential impacts on VEC, however, seems to be focused on acute, short-term impacts of these events, and do not properly address (at least in the summary) potential chronic and/or sub-lethal effects on VECs resulting from multiple releases either associated with this project specifically or from cumulative effects.</p> <p>Furthermore, the fact that this high likelihood of batch spills is widely noted in previous assessments of offshore oil and gas projects</p>	<p>-The EIS should properly assess the chronic sub-lethal and cumulative effects of the release of oil compounds on VECs. -Notably, the EIS should assess properly the risks of chronic and cumulative release of oil and other compounds on contaminants level in indigenous fisheries and food systems. -The EIS should include mitigation measures aimed at reducing the high risk of batch spill associated with this project. -The EIS should include follow-up and monitoring efforts to assess the efficiency of proposed mitigation measures to reduce the risk of batch spill, as well as to properly measure the effects of this project on oil contamination levels in the area.</p>

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		indicates that common mitigation measures are not effective in addressing batch spills.	
2	-6.1 Atmospheric Environment -6.8 Cumulative Effects -9.0 Follow-up and monitoring program	The EIS Summary shows that the project's greenhouse gases might represent half a percent of the total provincial GHG emissions for the province. We consider this level of emissions is significant and concerning, especially when considered through the lens of cumulative effects with the rest of the industry. The residual effects, especially for cumulative effects, should not be considered not significant.	-Residual effects for greenhouse gases emissions should not be classified as not significant, especially in terms of cumulative effects, and additional mitigation measures should be considered. -The monitoring and follow-up program should include monitoring of greenhouse gases emissions for all project components, including harder to predict sources such as fugitive emissions.
3	-7.0 Mitigation measures and commitments -9.0 Follow-up and monitoring program	In the context of offshore exploration, evidence on the effectiveness of mitigation measures is lacking. While the same measures are reused from project to project, even the recent Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador did not review mitigation measures for efficiency. More specifically, in this EIS Summary, references are not systematically included when mitigation measures are identified. The monitoring and follow-up requirements also do not include a review of the efficiency of the mitigation measure proposed, at least in the Summary.	-The description of proposed mitigation measures should include references attesting of their efficiency, or a detailed rationale for their selection if proposed measures have never been reviewed for efficiency. -Monitoring and follow-up should include a program to specifically review the efficiency of mitigation measures implemented, especially when measures have never been reviewed for efficiency.
4	-2.2.3 Geophysical, Geological, Geotechnical and Environmental Surveys -7.0 Mitigation measures and commitments	The mitigation of the potential environmental impacts of sounds generated by the project seems to be entirely based on the <i>Statement of Canadian Practice With Respect to the Mitigation of Seismic Sound in the Marine Environment</i> . However, this document should be considered outdated following its review by the Canadian Science Advisory Secretariat (<i>Review of the Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment, Science Advisory Report 2020/005</i>). This review identified	-The assessment of potential impacts and the selection of mitigation measures and monitoring requirements should be based on a review of the best available knowledge and practices, and include a critical review of the requirements of the <i>Statement</i> using the CSAS review and other available knowledge.

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		important knowledge gaps, and recommended a number of modifications and new mitigation measures. The <i>Statement</i> alone should no longer be considered good practice or sufficient to mitigate environmental impacts.	
5	-6.8 Cumulative effects -9.0 Follow-up and monitoring program	One of our repeated comments is that results from previous or parallel projects' follow-up and monitoring programs are rarely significantly included in environmental assessments, and this seems to still be the case here based on the EIS summary. The frequent lack of thoroughness of these programs and reports could be a factor, but also important is the fact that reports and data generated during pre-development studies as well as follow-up and monitoring programs are not aggregated or provided in a format that makes them easily accessible and usable for aggregation, review, and incorporation in other projects EA, or strategic and regional assessments.	-This EIS should include a clear review of nearby projects' follow-up and monitoring reports. This should include, if and when the reports provided by other proponents allow it, a review for adequacy of impact predictions, efficiency of mitigation measures, and cumulative effects assessment. -Data generated during pre-project surveys as well as follow-up and monitoring programs should be made available in a format that allows it to be analyzed, aggregated and reused for subsequent project-specific assessments, regional assessments or strategic assessments.