



April 30th, 2013

Attention: Team Leader, Conservation of Resources
Mr. David Hamilton
National Energy Board
444 Seventh Avenue SW
Calgary, AB, T2P 0X8

Reference: Public Meetings for TGS/PGS/MKI North Eastern Canada 2D Seismic Survey Project Registry Reference # 10-01-53884

Dear Mr. Hamilton,

Arctic Fishery Alliance LP (AFA) consists of four hunters and trappers associations and four community trusts from the communities of Qikiqtarjuaq, Grise Fiord, Arctic Bay and Resolute Bay. The partnership was formed in 2008 and in 2010 it acquired a 100 foot factory-freezer fixed gear vessel ("Suvak") to harvest its Greenland halibut (turbot) quotas in NAFO divisions OB (400 tonnes) and OA (1,030 tonnes). The vessel's fishing activity takes place in NAFO divisions OA and OB off the coast of Baffin Island when ice conditions permit (generally starting mid-April for OB and late July for OA), and the vessel fishes in division OB at approximately 63° North, 58° West, along the Exclusive Economic Zone border between Canada and Greenland.

We have reviewed the discussion paper for public comments (dated March 2013) for this proposed seismic survey as well as the provided responses to the key questions and concerns.. While it appears to comprehensively address environmental considerations and propose mitigation measures to reduce the survey's impact, we feel it has certain shortcomings with respect to the turbot fishery which we would like to point out in the following paragraphs.

Our first issue is the fact that our concern regarding the potential impact of the seismic survey reducing catch rates by causing fish concentrations to scatter. As we indicated, unlike mobile gear, vessels using fixed gear are not able to simply pick up their gear and move freely to other areas. As a result any distribution of fish concentrations in the proximity of the fishing area will require a greater amount of time to for fixed gear vessels to recover from. In our original letter we indicated that we will be collecting catch rates and effort for comparisons. Has there been any discussions concerning how MIK will deal with this issue?

In section 5.2 it is stated that the "seismic vessel will avoid active fixed gear fishing areas". While the avoidance of fixed gear (e.g. gillnets employed by the turbot fishery) is appreciated, the mitigation measure fails to mention at what distance the seismic vessel will circumvent the fixed gear fishing areas. We insist that a minimum safe distance between the seismic vessel, its towed array and fixed gear be

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Arctic Bay

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Resolute Bay

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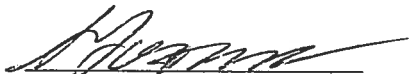
established. To ensure this minimum safe distance, the Fisheries Liaison Officer (as suggested in section 5.2) should communicate the location of the fixed gear fishing areas to the survey vessel.

Section 5.2 also states that *"a Fisheries Liaison Officer will maintain communication with all fishing vessels near the vicinity of the seismic survey"*. This statement lacks a definition of "near the vicinity". We suggest that this measure be clarified.

In addition, we insist that this mitigation measure be expanded to include mention of a daily email sent to the four quota holders of daily vessel location and planned tracks from the Fisheries Liaison Officer. This form of communication was acknowledged as necessary by MKI in the National Energy Board response to comments dated 23 February 2012 (p.16).

Finally, section 5.2 states the *"the seismic activity will not take place near any native harvest area"*. We request that this statement be clarified, particularly with respect to the phrase *"native harvest area"*. How will these areas be identified? What is the defined minimum safe distance?

We trust that the above comments and questions are helpful and will be taken into account in the development and implementation of environmental protections and mitigation measures for the proposed seismic survey.



Lottie Toomasie
Chairman and CEO,
Arctic Fishery Alliance L.P.