



Bureau of Minerals and Petroleum
att. Frederik Lynge og Lonnie Bogø Wilms

MEMO

Shell Kanumas A/S (15 March 2012), EIA, 2012 Shallow Coring in Baffin Bay, Northwest Greenland - evaluated and commented by DCE

The environmental impact assessment for Shell Kanumas A/S shallow coring activities in Baffin Bay 2012 has been evaluated by DCE and comments are listed below.

Susse Wegeberg
Line Anker Kyhn
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Dato: 11. maj 2012

Side 1/7

In general, the environmental settings are described in accordance with the strategic environmental impact assessment for the area (Boertmann & Mosbech 2011). Regarding discharges of waste and waste water, international agreements will be followed as well as only low-sulphur fuel will be used. MMSOs will perform systematic surveys according to DCE guidelines. The survey methods will be discussed before hand and adjusted with supervision from DCE.

Due to planned potential use of drilling mud additives, these chemicals and their amounts must be declared and approved (see below).

Furthermore, issues need to be addressed concerning discharge of drilling cuttings, under water video surveys, emissions to air, deployment of Free Fall Funnels, noise of activities as well as a worst case impact assessment:

Discharges to sea

Drilling additives

Regarding drilling additives, BMP Guidelines – for preparing an Environmental Impact Assessment (EIA) report related to stratigraphic drilling offshore Greenland, April 2011, 3b, states:

Use of drilling additives is subject to regulations described in “BMP Guidelines for preparing an Environmental Impact Assessment (EIA) report for activities related to hydrocarbon exploration and exploitation offshore Greenland, 2011”.

Hence planning for potential use of drilling additives in the present case leads to relevant requirements in these guidelines:



- Environmental Baseline Studies (EBS) and environmental monitoring (pre and post drill studies on water and sediment chemistry as well as description of benthic communities)
- A list of chemicals planned to be used or discharged shall be a part of the drilling application. The expected amounts used shall be estimated and the chemicals must have been tested and evaluated for their ecotoxicological properties according to OSPAR Harmonized Offshore Chemical Notification Format (HOCNF). The operator must select those chemicals that will pose the lowest risk of environmental impact, in particular those on OSPARs PLONOR list. Reference is made to OSPARs homepage (Link 3). Furthermore, the chemicals shall be included in the Danish Product Register PROBAS. The evaluation of the chemicals has to be documented and approved by BMP.

The chemical application must be followed by a plan for monitoring and reporting of use and discharges.

Due to the seemingly limited scope of the activities, though, and planning of using PLONOR drilling additives only, benthic fauna community samples and analyses may be argued to be omitted depending on the amount of drilling additive discharges applied for. At the moment no amounts of drilling additives planned for the drilling activities are stated in the EIA. Furthermore, if barite is planned to be used, environmental baseline concentrations of especially mercury will be necessary as well as post drill monitoring of sediment chemistry. Barite, even though it is classified as PLONOR, contains impurities such as mercury and hence provides an environmental problem. Mercury from barite in the sediment does seemingly not lead to increased levels of sediment organic mercury, but as methylated mercury is of profound health concerns in Greenland the discharges of mercury must be absolutely minimized.

The natural mercury level in the sediments in the northern Baffin Bay is not well known, but data from few samples show a level of 0.02ppm from off Svartenhuk Peninsula and northwards. Compared to the general natural mercury levels in Greenland subsea sediments (0.008 to 0.3ppm, average 0.06ppm) this is relatively low. For further comparison, Arctic Monitoring and Assessment Program (AMAP) defines sediments with a level of 0.05ppm mercury as uncontaminated.

Present and on-going post drill evaluations from the drilling campaign in West Greenland 2011 show that the limit of 1ppm mercury in barite used in drilling mud may give a significant rise to the sedimentary levels of mercury. In addition, due to the low natural levels, adding of even small mercury quantities to the sediments in the Baffin Bay will thus potentially possess a relatively high proportion.



Therefore DCE recommends that barite is not used in the shallow core drilling activities Baffin Bay 2012 campaign, but is substituted by products of lesser environmental concern. If barite is still planned to be used, we recommend that the following requirements are put forward:

- Environmental baseline and post drill monitoring of heavy metals must be performed around the drilling locations
- Barite to be used for the drilling activities must be documented to contain the lowest content of mercury of barite available on the international market
- Samples of barite planned to be used for the drilling activities must be forwarded to BMP for mercury analysis before activities are initiated
- Samples of barite in use must be taken during the activities and of drilling mud before discharge

These recommendations are preliminary and may be revised depending on the forthcoming evaluation of the products and amounts planned to be used / discharged and should not be interpreted as recommendation for a drilling additive / discharge approval.

However, in the EIA there is already made room in the operational programme for other data collection, which could include seabed sampling for laboratory testing as well as monitoring drill cuttings on seabed (4.2.4). This foreseen and appropriate planning is appreciated, thus needs and requirements for further information / data can be accommodated.

Drilling cuttings - video survey

BMP Guidelines - for preparing an Environmental Impact Assessment (EIA) report related to stratigraphic drilling offshore Greenland, April 2011, states:

“If the amount of drill cuttings, produced by the stratigraphic drilling operation, is evaluated to possess a possible significant impact to the environment, video/photo documentation for environmental background settings at the drill sites is required because of potential occurrences of particularly sensitive habitats.”

According to the scope of the project a video survey was recommended (DCE memo 15.02.2012) and hence presented in the EIA.

Regarding the video survey performed and the video material obtained and provided in the EIA, 2012 Shallow Coring in Baffin Bay, Northwest Greenland, Appendix F, the registration of organisms and their abundance follows the recommendations of Fisheries and Oceans Canada (DFO) and is related to the IUCN Red List of Threatened Species and OSPAR background papers' definitions of sponge aggregations and coral gardens.

How do the observations from the video survey support or add new information to available information described in the EIA?

Furthermore, there are in general three main issues with regard to the video material having in mind that the purpose of a video survey is to locate and identify habitats of organisms particularly sensitive to sedimentation resulting from drilling activities, such as sponge aggregations and coral gardens:

1. The video survey strategy / method and the rationale behind (assessment of area impacted by drill cuttings) are not clearly elaborated and described. Consequently, the video survey appears not performed in a systematic manner and the area covered (9,206 m²) is less than a third (28 %) of the area expected to be impacted by drill cuttings in a layer of 1 cm according to the EIA (Table 4-2). The total area expected to be impacted also seems somewhat underestimated (4,450 m² responds to an average drill depth of 404 m, the EIA states drill depths of 300-800m, expected to average 500m). Furthermore, the PNEC (Predicted No Effect Concentration) for *Lobelia pertusa* is estimated to 6.5 mm for sedimentation on this organism (recommended by CORAMM, Coral Risk Assessment, Monitoring and Modeling), which means that an even larger area may be critically affected if presence of *L. pertusa*.
2. The video sections are in general unfocused, which results in difficulties in a) evaluating bottom type; b) spotting and identifying fauna / fauna aggregations; c) re-finding observed and registered organisms as noted in Annex 2, Appendix F. Earlier presented UW videos from Greenland waters have shown that it is possible to obtain a better quality for identifying fauna as well as providing overview, off course dependent on water transparency.
3. The video is obtained too close to the bottom, and no over-view is presented, which limits a) the chance to observe fauna aggregations, boulders or other structures which may house more rich communities and b) limits the area surveyed.

Therefore, the provided video material does not provide sufficient data to positively exclude the presence of particularly sensitive habitats in the area potentially impacted by drilling cuttings and mud. DCE recommends that a more comprehensive seabed mapping is being provided, also bearing in mind that seabed imaging may be the only data provided on the benthic communities potentially impacted. The video survey strategy must be clearly described together with the rationale behind. Furthermore, the videos obtained must be of better quality in general to be able to identify the bottom conditions and present benthic fauna.

For comparison, areas, which were video surveyed in connection with oil exploration drilling locations, are presented below including survey methods:



Survey performed	Methods	Area
Shell Kanumas , Shallow Coring	Drop camera	9206 m ²
Cairn / Benthic Solutions, West Greenland	Side scan sonar /ROV video	6 X 6 km / 30.000 m ²
Fugro, Norway	Side scan sonar / drop camera	8 X 6.5 km

FFFs

In the EIA it is stated that Free Fall Funnels (FFFs) may be used for re-entering the borehole. 5-10 FFFs may be deployed. A FFF will be buried in drill cuttings, not to be recovered after termination of the operation, but left in the borehole for disintegration by rusting. However, BMP Application Guidelines is stating that all non-degradable material and structures shall be removed upon termination of the operation, unless BMP approves otherwise. DCE considers FFFs non-degradable as rusting over time is not within the terms of being (biologically) degradable. It is not clear what the expected time span for disintegration may be. Presence and rusting of FFFs may not comprise an environmental problem, but all alien objects left in the environment should be considered carefully, and these components must be included in the impact assessment. DCE has not assessed the technical necessity of leaving FFFs on / in the seafloor.

Oil in water discharges

For general information regarding discharges to sea, it is not recommended to discharge water or other liquids to sea with oil contents above 15ppm. It is recommended to test the content of oil in water with the standard ISO 9377-2:2011 (Norwegian or Danish). Other methods can be used (e.g. online analyses) if these alternative methods are calibrated against the standard method, and this is documented.

Waste management

Regarding waste management, only daily amounts of grey and black water is estimated for discharge. Solid waste has not been estimated in the EIA. DCE recommends that amounts of grey and black waste water are estimated for the full activity period ($\approx 49 / 68$ days) as well as waste management including amounts and reporting of hazardous and non-hazardous solid waste.

Emissions to air

1494 t of fuel (with sulphur content $< 1.5\%$) are estimated to be consumed during the drilling programme. DCE recommends that emissions of gasses (CO_2 , CO, NO_x , N_2O , SO_2 , VOCs) to air are calculated and stated in the EIA. It is the gas emissions, which are of environmental concern. Calculation methods from fuel consumption to emission of gas must be documented.



Potential impacts of accidental events

Because oil spills are very harmful to birds, a potential oil spill should be considered as a worst case scenario, and hence described and assessed in an EIA (p. 113: “However, numbers are expected to be quite low particularly considering mitigation measures and the small amount of marine gas oil considered in the accidental spill scenario”).

It is suggested that any dead birds on deck are collected, frozen and forwarded to the Greenland Institute of Natural Resources.

Noise

Regarding noise exposure of the VSP, DCE only has a few comments and agree with the conclusion of the EIA that there is little potential for physical injury to marine life given the short duration of the exposure (<10 shots per drill site).

DCE agrees with the proposed mitigation measures and acknowledge that two MMSOs will be aboard the JOIDES Resolution during the entire survey. These observers may, besides their mitigation obligations, provide valuable information on marine mammals and sea birds from a relatively unstudied area. DCE refers to the BMP guidelines for mitigation and data collection, which can be found here (<http://www.bmp.gl/petroleum/approval-of-activities/offshore>) and must be adhered to.

Still, given the specific information that is sought from a VSP operation and the choice of a high source level, DCE suggests to consider whether it would be possible to lower the airgun closer to the seabed before shooting in order to decrease the exposed area. This should be considered for future mitigation if not possible this year.

Detailed remarks / questions regarding noise

Page 98: ” A typical ocean drilling vessel’s engines and thrusters will generate ~154 dB re 1 μ Pa of noise, not including drilling activities (IODP 2008).” This is not clear; is it rms, p-p? And within which frequencies?

Page 99: Regarding modelling of vessel noise, why hasn’t drilling noise been included in the modelling combined with thruster noise? What is the duration for the rms calculations?

Page 99: “Mitigation measures in place to reduce the impacts of vessel traffic on marine mammals include spatial avoidance of protected areas and the fact that the coring vessel will steer a straight course and maintain a constant speed whenever possible during transit to and from coring sites, and avoid marine mammals to the extent possible.” Shell Kanumas A/S should at all



times keep out of NPZ-I. DCE also recommends that Shell Kamunas A/S uses the lowest possible vessel speed during transfer and maximum 14 knots.



GRØNLANDS KOMMANDO

GLK GLK-FIO-1

100.00

071/12

2012-04-26

(Bedes anført ved henvendelser)

Til
Råstofdirektoratet

Emne:
Høringssvar vedrørende Shell Kanumas A/S miljøvurdering (EIA) for udførelse af kerneboringer i de øverste geologiske lag af undergrunden i Baffin Bugten, Nordvestgrønland.

Ref.:

- a. Råstofdirektoratets anmodning om høring af 2012-03-19.
- b. Environmental Impact Assessment. 2012 shallow Coring in Baffin Bay, Northwest Greenland.

1. Grønlands Kommando (GLK) er ved ref. a. blevet anmodet om, at fremsende høringssvar vedrørende Shell Kanumas EIA for udførelse af kerneboringer i de øverste geologiske lag af undergrunden med udtagelse af 11 borekerner fra 7 lokaliteter i Baffin Bugten, Nordvestgrønland.

2. GLK finder at ref. b. i sin nuværende form giver et generelt godt overblik over det skitse-rede projekt. GLK har endvidere taget til efterretning at Shell vil fungere som hovedoperatør for dette projekt, som udføres med følgende aktører: ConocoPhillips, Maersk Oil, Cairn Energy, Nunaoil, GDF SUEZ, Dong Energy og Statoil.

3. Vedrørende de involverede skibs- og breenheder, så vil GLK erindre om reglerne for det obligatoriske meldesystem GREENPOS, som anvendes ved rejser til og fra Grønland. GLK vil endvidere anmode om rettidige periodeoplysninger om planlagte boringer og disses positioner, således relevante navigationsadvarsler kan udsendes.

Vedrørende kontaktinformationer til deltagende maritime enheder, så anmodes disse fremsendt til GLK, således kontaktmulighed er etableret.

Postadresse 3930 Kangilinnguit Grønland	Telefon Omstilling: +299 691911 Gennemvalg: +299 691955 + 330	Telefax Administration: +299 691912 Operation (døgnåben): +299 691949	Internet Administration: glk@glk.gl Operation: iscomgl@glk.gl
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4. Kontaktperson ved GLK er Havmiljøofficer, kaptajnløjtnant Nils Westergaard, FIIN: GIK-FIO01 eller E-mail: fi01@glk.gl & nilsw@mil.dk.

E.b.

NILS WESTERGAARD
kaptajnløjtnant



Inuit Circumpolar Council - Grønland

Høringssvar vedrørende Vurderinger af Virkninger på Miljøet (EIA) for ansøgte udførelse af kerneboringer i Nordvestgrønland af Shell Kanumas

Nuuk den 14. maj 2012

Inuit Circumpolar Council – Grønland (ICC Grønland) har gennemgået den fremsendte Vurdering af Virkninger på Miljøet (VVM) af udtagelse af 11 borekerner fra 7 lokaliteter i de øverste geologiske lag af undergrunden i Baffin Bugt under forundersøgelsestilladelse nummer 2011/60, Nordvestgrønland. Ansøgningen er indsendt af Shell Kanumas A/S, og dækker et areal på ca. 3.047 linje-km og forventes at have en varighed på ca. 2 måneder fra starten af august.

GENERELLE BEMÆRKNINGER

ICC Grønland finder det positivt at Råstofdirektoratet har forlænget den offentlige høringsfrist til 8 uger, som er helt i tråd med ICC Grønlands tidligere anbefalinger. Det samme gælder for selskabernes frist til at indsende projektbeskrivelse senest 1. februar i det pågældende år, således at det bliver lettere at få et overblik over mulige kumulative effekter af forskellige projekter.

SPECIFIKKE KOMMENTARER

I EIA'en fremstår det ikke klart hvorfor de 6 ud af 11 borekerner skal udføres udenfor licens-blokkene og ikke inden i dem, og hvad baggrunden er for at udføre dem i dette område. Det er ikke klart om der er blevet søgt særlig tilladelse til at lave aktiviteter udenfor licens-blokkene. Formuleringerne er generelle og vage, og giver det indtryk at der enten bores for at opfylde nogle forpligtelser, eller fordi der er ønske om at gå videre med efterforskning udenfor licens-blokkene. Dette bør gøres klart og tydeligt, så der ikke opstår tvivl om intentionen. Hvis det er intentionen at der ønskes at udføre efterforskning i dette område så tæt på narhvalernes beskyttelseszone I (NPZ-I) kræver det nogle helt andre overvejelser end hvad der lægges op til her.

Der ønskes flere detaljer over det naturlige indhold af mineraler i det vandbaserede mudder. Det bør sikres at der ved målinger på det aktuelle boremudder ikke overskrider grænseværdier for f.eks miljøgiftige tungmetaller.

Det fremgår ikke i EIA'en om fartøjet er is-klassificeret. IMO's retningslinjer for skibe, der opererer i polære farvande (IMO *Guidelines for Ships Operating in Polar Waters 2009*) anbefaler netop at fartøjer som minimum bør være af is- eller polar-klasse. Selvom retningslinjerne er frivillige, betragter ICC Grønland dem som udtryk for best practice. Shell Kanumas bør i fremtiden tilstræbe at alle fartøjer der benyttes er af is- eller polarklasse. ICC Grønland opfordrer industrien til at udvikle materiel der opfylder det stigende behov for benyttelse i arktiske farvande, for at sikre at systemerne er robuste i alle tilfælde.

ICC Grønland vil gerne meddele, at dette høringssvar gerne må offentliggøres på Selvstyrets hjemmeside. ICC Grønland lægger også høringssvaret ud på sin egen hjemmeside www.inuit.org under Aktiviteter → Offentlige høringer i Grønland.

ICC Grønland takker for fortsat at være høringspart, og ser frem til fortsat samarbejde.



Råstofdirektoratet
Frederik Lyngø
3900 Nuuk

IAANs svar til høring vedr. indsamling af seismiske data

Infrastrukturkontoret skal gøre opmærksom på, at operatører, der ønsker at foretage charterflyvninger til godkendte flyvepladser i Grønland, skal have en tilladelse fra Trafikstyrelsen. Operatører, der ønsker at foretage cabotageflyvning i Grønland, uden at have en forudgående tilladelse, skal have en beflyvningstilladelse fra Trafikstyrelsen og Grønlands Selvstyre i henhold til IAANs og Trafikstyrelsens procedurer herfor.

Infrastrukturkontoret har ikke yderligere kommentarer til høringen, da det er IAANs forståelse, at

- projektet ikke involverer etablering af infrastrukturanlæg på land
- de aktiviteter, der søges om, vil blive reguleret i henhold til international og national søfartslovgivning

Inussiarnersumik inuulluaqqusillunga
Med venlig hilsen

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KANUKOKA

Kalaallit Nunaanni Kommunit Kattuffiat • De Grønlandske Kommuners Landsforening

Grønlands Selvstyre
Råstofdirektoratet
bmp@nanoq.gl

Ulloq/Dato: 14-05-2012
J. nr.: 74.00

Att. Frederik Lyngø

Høringssvar vedr. ansøgning fra Shell Kanumas A/S om tilladelse til at gennemføre kerneboringer under forundersøgelsestilladelse 2011/60 i havområder ud for Vestgrønland.

Kommunernes fælles råstofgruppe har gennemgået høringsmaterialet og har følgende kommentarer:

Det oplyses i høringsmaterialet, at der skal anvendes sonar til lokalisering af borehuller. Kommunerne mener, at høringsmaterialet er mangelfuldt i beskrivelsen af denne aktivitet, og har derfor svært ved at bedømme, om sonarlokaliseringen kan udgøre et problem i forhold til områdets dyreliv. Der bør derfor indhentes en yderligere beskrivelse af hvad aktiviteten indebærer herunder de forventede påvirkninger af dyrelivet, samt en særskilt vurdering af påvirkningen fra sonaren fra Grønlands Naturinstitut og DCE, da anvendelsen af sonaren sker tæt på beskyttelsesområdet for narhvaler.

Med den store aktivitet i området er en vurdering af de kumulative effekter af alle aktiviteterne af stor betydning.

Forpligtelsen til så vidt muligt at anvende lokal arbejdskraft i henhold til §18 i råstofloven bør understreges overfor licenshaver.

Kommunerne vil i øvrigt bifalde den indsats Shell Kanumas sammen med de øvrige licenshavere i området har gjort for at oplyse borgerne om de kommende aktiviteter.

Med venlig hilsen
På vegne af Kommunernes fælles råstofgruppe

Zenica Gosvig Larsen
Specialkonsulent.

Frederik Lynge

Fra: Martin Schjøtz-Christensen <Martin@business.gl>
Sendt: 9. maj 2012 11:10
Til: Frederik Lynge
Cc: Marie Fleischer; Kaare Winther Hansen; Anne Sofie Hardenberg; Inger Christiansen
Emne: FW: VS: VS: Offentlig høring af miljøvurderinger om planer for kulbrinteaktiviteter i Baffin Bugt

Kære Frederik Lynge,

Behandling af disse 4 høringer er i Kommuneqarfik Sermersooq henlagt til administrativ besvarelse, via Sermersooq Erhvervsråd (SBC)
SBC har inntet at bemærke i denne forbindelse. Selv om samtlige høringer vedrører områder uden for Sermersooq, sætter vi pris på orienteringen.

Inuulluaqqusillunga // Med venlig hilsen // Best Regards
Martin Schjøtz-Christensen
Projektleder, Sermersooq Erhvervsråd

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Look us up at: www.sermersooq.com and www.business.gl

Fra: Frederik Lyng [mailto:FRL@nanoq.gl]
Sendt: 19. marts 2012 20:04
Til: Jørgen T. Hammeken-Holm
Emne: Offentlig høring af miljøvurderinger om planer for kulbrinteaktiviteter i Baffin Bugt

Kære alle

Råstofdirektoratet har i dag bragt nedenstående 4 miljøvurderinger af planer for kulbrinteaktiviteter i Baffin Bugt, Nordvestgrønland, i offentlig høring via høringsportalen www.nanoq.gl. I tilfælde af hel eller delvis imødekommelse af aktivitetsplanerne, vil disse blive sat i værk i løbet af sommeren/efteråret 2012.



Råstofdirektoratet

NNPANs høringssvar vedr. udførelse af kerneboringer i de øverste geologiske lag af undergrunden under licens 2011/60

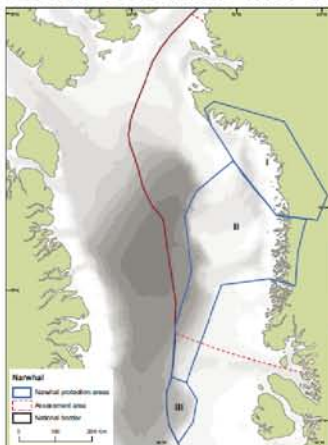
Departementet for Indenrigsanliggender, Natur og Miljø (NNPAN) modtog den 28. marts 2012 høring vedr. Shell Kanumas A/S ansøgning om udførelse af kerneboringer i de øverste geologiske lag af undergrunden under licens 2011/60.

Det ansøgte område er beliggende i Baffin Bugten, Nordvestgrønland. Forventet periode for undersøgelserne er i perioden august til oktober 2012. NNPAN bemærker, at store dele af aktiviteterne sker uden for licensblokkene.

NNPAN har indenfor høringsfristen ikke haft mulighed for at undersøge miljøeffekten af borevæskerne, der evt. skal anvendes ved borerne. NNPAN henstiller derfor til, at Råstofdirektoratet rådfører sig med DCE for at få afklaret, hvorvidt borevæskerne bør benyttes i grønlandsk sammenhæng. NNPAN ser gerne at DCEs høringssvar vedr. borevæskerne videreformidles til NNPAN, så det kan indgå i den grønlandske forvaltnings vidensopbygning.

Beskyttede områder

Dele af det område hvor der ansøges om at udføre seismiske undersøgelser er inden for et beskyttet område for narhval samt sårbare områder for hvidhval og grønlandshval. I rapporten *Eastern Baffin Bay – A strategic environmental impact assessment of hydrocarbon activities*¹ fremhæves de beskyttelsesområder for narhval, se figur 1. I det såkaldte område 1, der er et sommerlevested anbefales det i rapporten at man undgår eller begrænser seismisk aktiviteter i perioden 15. juli til 25. oktober. I det såkaldte område 2, som er migrationskorridor anbefales det, at seismiske aktiviteter begrænses i perioden fra 15. oktober til 1. december. I det såkaldte område 3, der er et vinterlevested pointeres det i rapporten, at seismiske aktiviteter slet ikke bør foretages.



Figur 1: Beskyttede områder for narhvalen².

Melville Bugten er på grund af sin fjerne beliggenhed og status som beskyttet område³

¹ DCEs Videnskabelig rapport nr. 9 fra 2011 (<http://www2.dmu.dk/Pub/SR9.pdf>).

² DCEs Videnskabelig rapport nr. 9 fra 2011 (<http://www2.dmu.dk/Pub/SR9.pdf>), side 148.

11. maj 2012
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med henblik på at begrænse forstyrrelsen af narhvalerne et vigtigt kerneområde for narhvalen. Dette er af stor betydning for den grønlandske narhvalbestand, da en stor del af bestanden opholder sig i Melville Bugten om sommeren⁴. Det vil sige, at de seismiske aktiviteter potentielt ikke kun har en lokal effekt på arten, men kan have en effekt på hele grønlandske bestand.

NNPAN noterer, at den angivne aktivitetsperiode ligger inden for den sårbare periode for narhval. NNPAN henstiller til, at man følger anbefalingerne i rapporten *Eastern Baffin Bay – A strategic environmental impact assessment of hydrocarbon activities* for at undgå unødigt forstyrrelse af de arter, der befinder sig i området.

Kumulative effekter

NNPAN anbefaler, at man under beskrivelse af de kumulative effekter endvidere behandler effekten af eventuelle yderligere aktiviteter i de kommende år. Det vil sige, at det bør vurderes hvilke konsekvenser, der kan opstå, hvis der i de kommende år bliver udført yderligere råstofaktiviteter (herunder seismiske aktiviteter) i og nær de sårbare områder og at arterne derved oplever gentagende forstyrrelser indenfor deres kerneområde.

Seismiske aktiviteters effekt på adfærd

I EIAen er der kun i begrænset omfang redegjort for de seismiske aktiviteters effekt på narhvalernes adfærd. Hovedfokus er på hvilke fysiske effekter de seismiske aktiviteter kan have på arterne, herunder specielt på nært afstand. Det oplyses i EIAen, at der er manglende viden om de adfærdsmæssige effekter. NNPAN anbefaler, at der udføres flere undersøgelser på hvilke konsekvenser, der kan være på arternes adfærd ved udførelse af seismiske aktiviteter, herunder særligt hvilken effekt de seismiske aktiviteter kan have på narhvalerne i deres sommerområde i Melville Bugten.

Inussiarnersumik inuulluaqqusillunga

Med venlig hilsen

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³ Hjemmestyrets bekendtgørelse nr. 21 af 17. maj 1989 om naturreservatet i Melville Bugt

⁴ Grønlands vinterhvaler – hvidhvalen, narhvalen og grønlandshvalen 2006, side 89