



**Inuit Circumpolar Council - Greenland consultation statement regarding:
EIA for 2D seismic survey off Southwest Greenland by GXT**

Nuuk, May 10, 2013

Inuit Circumpolar Council - Greenland (ICC) has reviewed the submitted Environmental Impact Assessment (EIA) of the proposed 2D seismic survey off Southwest Greenland. GX Technology Corporation (GXT) submitted the application, covering an area of up to 4,800 line kilometres in license area 2013/10 and is expected to take place between 40-60 days in the period of June to November 2013.

GENERAL COMMENTS

ICC recommends that environmental impacts of seismic surveys taking place in several consecutive years be analysed. Furthermore ICC recommends that observations of traditional users of the area (hunters and fishers), in relation to previous years' seismic surveys, be taken into account when assessing environmental impacts of future seismic surveys.

ICC would like to emphasize that the principle of Best Available Technique (BAT) and Best Environmental Practices (BEP) should apply in any relevant cases during the execution of the project. Where there is a difference in standards, practices and demands between industry, government and international standards, BAT and BEP should always prevail as the main priority. The industry can play a unique role in offering insights into best practices in their area of expertise, and should not be afraid of taking the lead on higher environmental standards than what may be demanded by government agencies and thereby inspire a change in government policies to the better.

ICC in general supports the consultation statements by DCE and GINR, especially in regards to cumulative effects between the surveys of GXT and TGS-NOPEC, as cited:

“The GXT-survey area will to some extent overlap with the survey area of TGS-NOPEC. GXT mentions that to avoid acoustic interference with the TGS-survey a 30 km distance between the seismic sound sources will be applied, and that this will be sufficient also to avoid cumulative impacts on marine mammals. The EIA prepared by TGS propose a 50 nm distance. As this must be an absolute minimum, DCE and GINR propose that a 100 km clearance should be applied.”

In the Arctic Council, there is an increasing focus on Black Carbon (BC, e.g. soot) and its localized warming effects as a short-lived climate forcer. There is also focus on Arctic Ocean Acidification as “the second CO₂ problem”, which the scientific community is stating to be real, undisputed, happening at an alarming rate, and will have consequences for Arctic marine waters - although the direct and indirect effects are not clarified yet. Both focus areas are derived effects of combustion of fossil fuels, and the Arctic Council will at its next Ministerial Meeting in Kiruna this month look into possibilities of further developing common strategies and actions to reduce these effects.

The industry has their share in the responsibility of mitigating effects on the climate and ecosystems, and should therefore consider ways of best practices to reduce emissions, and use resources more efficiently on their own initiative.

SPECIFIC COMMENTS

Page 11, section 3-1:

On the list of national legislation and guidelines is mentioned:

“Greenland Parliament Act no. 7 of 7 December 2009 on mineral resources and mineral resource activities (the Mineral Resources Act).”

In this context, it should also be added that:

“An amendment to the Mineral Resources Act was adopted by Parliament and in effect by 1 January 2013.”

In connection with this year's seismic activities, NIRAS Greenland A/S has commissioned a report with modelling of sound propagation in the waters off Northeast Greenland.

The report gives a better view of the possible effects of seismic projects in the area. However, it mentions that there is little information on the physical environment, there is little mention of shadow and convergence zones. This is otherwise highlighted in the mitigation guidelines and by e.g. Madsen et al. (2006) as the Arctic waters have stronger stratification that can create special convergence zones, even many miles away from the sound source (up to 12 km), where the sound pressure level suddenly can be amplified and higher frequencies than planned. This in turn may have an effect, not only on the baleen whales, but also toothed whales farther from the sound source. Whether modelling takes these possible convergence zones into account is not clear.

Even if it is not determined which contractors and subcontractors will be used, it should still be noted that they would have to comply with national and international standards. The IMO Guidelines for Ships Operating in Polar Waters (2009) recommends that vessels operating in the Arctic should be at least of ice or polar-class. Although the guidelines are voluntary, ICC considers them an expression of best practice.

This consultation statement may be published on the Greenland Self-Government website. All ICC's statements are also available on our website www.inuit.org in Activities → Public consultations in Greenland.

ICC thank you for the continued inclusion as a consultation party, and look forward to continued cooperation.

References

Madsen, P T et al. "Quantitative measures of air-gun pulses recorded on sperm whales (*Physeter macrocephalus*) using acoustic tags during controlled exposure experiments." *Journal of the Acoustical Society of America* 120.4 (2006) : 2366-2379.