

**GOIA Comments on Offshore Seismic Surveys in Greenland - Guidelines to Best Environmental Practices (BEP), Environmental Impact Assessments (EIA) and Environmental Mitigation Assessments (EMA); 31 August 2015**

#	Pg	Section	Par .	GOIA Comments
1	3	Summary	6	<i>A 2-month turnaround time for model verification results is not practically viable due to the logistics requirements in retrieving the data, the complexity of the modelling, the inherent time it takes to generate a report (data verification, quality assurance measure and internal review). As it is in the interest of both the regulatory and regulated communities to assure that reports of model results be of the highest level of accuracy achievable, GOIA requests the submittal schedule to be no later than 1 April of the following year per standard Greenland requirement for data submittal.</i>
3	4	Summary	1	<i>During normal seismic data acquisition operations it is usual practice to continue data acquisition once initiated, across multiple seismic lines through the use of a mitigation gun to maintain warning to and avoidance by marine mammals. To provide clarity for this requirement, GOIA requests that "seismic lines" be changed to "seismic data acquisition".</i>
2	8	2	6	<i>Because leaving in place the anchors used for acoustic moorings results in the least environmental impact and safety exposure, GOIA recommends that it not be required to retrieve them.</i>
4	11	3	5	<i>GOIA requests the guidance document allow for the full regulatory process, including Scope of Project Authority evaluation, revision, Public pre-consultation, Approval of Scope, Public consultation, White Paper process, Approval, EIA/EMA revision and final approval be started immediately upon submittal and be completed commensurate with the timeline based on the submittal date rather than a calendar date.</i>
5	16	5.1	1	<i>Because currently there are no source models used in the industry that are validated up to 48kHz, the available source models validated up to 25kHz last year using a JIP Sound and Marine Life data set could not be used for validation purposes for frequencies beyond 25kHz as the S/N ratio was essentially zero, and modelling beyond 25kHz is not an application of Best Available Technology (BAT), GOIA recommends that the use of high frequency ranges in source models that have not been validated is not considered a requirement.</i>
6	17	5.2	1	<i>Because acoustic measurements taken in the Baffin Bay in 2012 demonstrated that there was insignificant difference (&lt;1-2dB) in recorded sound levels at 100, 200 and 400 m depths, GOIA recommends the recording of sound levels at different depths should be considered optional rather than required.</i>
7	23	6.4	1	<i>Visual monitoring has been demonstrated as an effective mitigation measure through both international research and operational experience of GOIA. For this reason GOIA suggests the sentence around visual monitoring be reworded to 'When visual observation is not conducive to mitigation (e.g. during periods of darkness, poor visibility or sea state above 3), PAM will be used to augment observer capacities'.</i>
8	24	6.5	6	<i>In order to ensure safety of all personnel during all vessel operations, GOIA suggests the text be changed to reflect that licensees and their contractors are to construct temporary observation structures on vessels if it can be demonstrated that they do not compromise operational safety and vessel function, and that they conform with licensee and contractor vessel safety management policies and systems. It should be recognised that temporary structures may be inappropriate for conducting and maintaining safe operations in all sea states and operating conditions. In such instances other accommodation for MMSOs must</i>

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				<i>of course be provided.</i>
9	26	7	2	<i>GOIA requests the phrase 'specific regulation' within the proposed protection area designated as an 'Area of Concern' unfolded and clarified so that operators in licence blocks falling under such protection area designation understand the possible requirements for acquiring seismic data.</i>
10	26	7	4	<i>As the proposed protection areas designated as an 'Area of Concern' cover existing licence areas and that these 'protection areas' have not previously been formalised within the regulatory process, GOIA recommends the current protection areas be kept in place until the new protection areas and the basis for their respective boundaries is submitted independently for public consultation.</i>