

Good morning

Thank you for the opportunity to comment on the above. Please find comments below on behalf of TGS.

1. Three months between draft Scope (1st December) and EIA (1st March) is a very tight timeframe. Would it be possible to provide the Scope before 1st December and for subsequent deadlines, including final approval, to be adjusted accordingly?
2. The consultation period for the draft Scope (35 days) is very long. Two weeks would surely be reasonable and provide adequate time for comments on a high level document.
3. Likewise, 8 weeks is a long consultation period for the draft EIA and if any hearings are held towards the end of this period there is the impression that comments cannot be accommodated. Would it be possible to reduce to 4 weeks with any hearings then held within weeks of this deadline?
4. If we learn of other planned survey operations in early December (following issue of draft Scopes) the requirement to undertake modelling of noise propagation from all surveys is reasonable. If the presence of other survey operations is not known until March (following issue of draft EIAs) then it may not be practical to undertake meaningful modelling in the time available.
5. Will MRA/EAMRA make available general information on airgun and other survey characteristics to allow meaningful cumulative noise modelling to be undertaken?
6. Will MRA consider limiting translation requirements concerning the white papers to match the language in which comments are received (Greenlandic, Danish or English)?
7. If marine mammals are detected within 500m of airgun array during full power the guidelines require use of mitigation gun only for a minimum 20 minute period. Could alternative distances be acceptable if supported by suitable noise modelling? The guidelines do not apply to polar bears on the ice. Do they apply to seals on the ice?

Regards

Ian

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Director

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