# Introduction

On April 1, 2026, Multiklient Invest (MKI) submitted to the Canada-Newfoundland and Labrador Offshore Energy Regulator (C-NLOER) an addendum to its *Assessment of Multilient Invest's Newfoundland Offshore Seismic and Environmental Data Collection Program 2026-2030* (EA Addendum). The EA Addendum was submitted in response to review comments issued by the C-NLOER on October 28, 2025.

Following review of the EA Addendum, the C-NLOER advises that the majority of review comments were satisfactorily addressed. Fisheries and Oceans Canada has also provided additional comments on select items which are provided below.

# Fisheries and Oceans Canada (DFO)

**General Feedback**

The 500 m safety zone mentioned throughout the Environmental Assessment Report is noted to be the minimum size required under the *Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment*.

The cumulative effects of frequent, high-intensity impulses on marine mammals, turtles and other species are difficult to quantify. The surveys are expected to span multiple summer seasons in important marine mammal feeding and raring habitat, which may add additional uncertainty due to the presence of young individuals.

Is it possible to extend the safety zone beyond 500 m if conditions are agreeable for marine mammal observers?

The following sources may be useful to define the size of the safety zone (a shared origin between some sources and the EA Report is noted):

https://csas-scas.dfo-mpo.gc.ca/meetings-reunions/f088ddae-d7bb-42c5-8ac7-454d0d4239b4

https://www.fisheries.noaa.gov/s3/2025-09/ESA-AllSpeciesThresholdSummary-2025-508-OPR1-9.16.25-.pdf

**Specific Feedback**

MKI's response to comment DFO-3:

- The replacement text in the Addendum should also include this relevant statement from Section 4.2.1.1 of the EA Report: "However, planktonic stages of commercial invertebrates (e.g., northern shrimp Pandalus borealis, snow crab Chionoecetes opilio, and fishes (e.g., Atlantic cod Gadus morhua) are described in the following subsections because of their VC status."

MKI's response to comment DFO-5:

- DFO is happy to clarify any regulations that pertain to conservation measures such as OECMs in the proposed project area.
- Regarding Figure 4.63, the 3O Coral Closure is not properly identified in the legend as an OECM / Marine Refuge.