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Wednesday, September 12, 2012

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 4th Floor
St. John's, NL A1C 6H6

Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the opportunity to comment on the Environmental Assessment of the Ptarmigan Geophysical Program for Offshore Western Newfoundland, 2012-2021. I'd like to comment on a few aspects of the study that are representative of issues and concerns from the fishing industry, namely the members of the FFAW/CAW.

Two consultations were held with fish harvesters during the development of this Environmental Assessment in June and July 2012. Issues and concerns addressed at that time concerning the long term impacts of program activity on species such as lobster, crab and shrimp resources are documented in the EA. Ptarmigans 2012 area of interest for seismic survey does overlap with important fishing grounds. The proponent looked for a window of approximately 30 days in which they could pursue their program in the area. It has been indicated to the FFAW that the likely best time to pursue 30 days of seismic activity would be between mid-July and the end of August, in the context of current 4R fisheries.


Fish harvesters indicated at the second meeting that the species of immediate concern would be Herring and Mackerel, if the program is pursued between September and December. This is not adequately captured in the EA. Pelagic fish would be most directly impacted by seismic activity, due to their location in the water column.

Further to this, it was indicated to harvesters at the July meetings that the program area had been downsized to 1,014 m², yet the EA is indicating on page 11 that the area is 1,014 km². It would certainly be necessary for such discrepancies to be reconciled.

It is important that the area provides significant economic return for many fishing enterprises that are primarily harvesting on the West coast of Newfoundland. Fishing activity can change from year to year and during the season as well. It is very important that Ptarmigan Energy maintain regular communication with the FFAW to keep apprised of ongoing developments with fisheries in the project area throughout the duration of this Environmental Assessment (2012-2021).

I thank you for providing an opportunity for the FFAW/CAW to comment on this EA. If you have any questions or comments please feel free to contact me.

Kind regards,


Johan Simun/loensen
Petroleum Industry Liaison