
KEITH SULLIVAN
President

DAVID DECKER
Secretary-Treasurer

Tuesday, February 4, 2020

Ian Murphy
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
St. John's, NL A1C 6H6

Re: BHP Canada Exploration Drilling Project EL1157 and 1158 Seabed Survey

Dear Mr. Murphy,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/Unifor) with the opportunity to comment on the BHP Canada Seabed Survey project.

There are a couple of statements in the document that must be clarified to ensure there is an appropriate level of understanding of the dynamic nature of the fishery offshore.

Greenland halibut, also known as turbot, is primarily fished using bottom trawls (page 40). The larger offshore boats, with more quota to fish, utilize mobile gear to catch fish. The inshore fishery however primarily uses fixed gear (i.e., gill nets) to harvest smaller allocated amounts of quota. As such, there are more fishing vessels on the water using fixed gear than the larger vessels trawling for the same species, depending on the fishing season. This is an important point that warrants discussion in the document when considering transit routes for the survey vessel (if it is during the fixed turbot fishing season).

The shrimp fishery in Shrimp Fishing Area 7 (NAFO Division 3L) has been closed since 2015 (not 2017, page 40). While this area is not expected to open for shrimp fishing in 2020 the closure is not a permanent closure. The proponent should review the status of the closure annually.

While it is not expected that inshore fish harvesters will fish directly within EL1157 and EL1158 there may be some international fishing activity in the area, depending on the timing of the survey (page 43). Seismic and other exploration

project vessels have encountered swordfish fishing, for example, in the general area over the years.

Further to this, there is still a potential for interaction between fishing and project activities (page 45, 51). While advance communication is beneficial to all parties it will not necessarily eliminate space conflicts during the survey. Respectful on-the-water dialogue will be vital to resolving space conflicts, should they arise.

Thank you again for the opportunity to review this project.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
