

PO Box 10, Station C
368 Hamilton Ave, Second Floor
St. John's, NL A1C 5H5



FFAW | UNIFOR
Fish, Food & Allied Workers

Phone: 709.576.7276
Fax: 709.576.1962
Web: ffaw.ca

**RE: BP Canada Energy Group ULC Epheus Prospect ROV Survey, 2019 to 2024
Amendment – Public Comments**

Mr. Darren Hicks,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW-Unifor) with the opportunity to comment on the Amendment of BP Canada Energy Group ULC Epheus Prospect ROV Survey, 2019 to 2024.

We are pleased with decisions to increase the degree and magnitude of environmental monitoring required for this survey considering the sensitive area it occurs directly within. The Northeast Slope Marine Refuge was enacted to protect keystone corals and sponges and subsequently prohibit human activities incompatible with conservation of long-term biodiversity, **including all bottom contact fishing**. This continues to be confusing and somewhat hypocritical from a membership perspective, as offshore drilling, and now, the installing of multiple mooring devices embedded into the seafloor continue to be allowed. The high concentrations of fragile corals and sponges within the survey area are slow to recover and provide habitat for valuable species. There is little known about the corals and sea pens that this marine refuge was created to protect, including their distribution and vulnerability to drilling and associated wastes. Since the impacts of drilling wastes and installed mooring devices on the benthic community structure cannot be properly evaluated without crucial survey information, the data collected and conclusions drawn from these seabed surveys should eventually be made publicly available.

The amended temporal scale warrants extensive and continuous communication with the fishing industry throughout. The overall length and frequency of field programs has increased. Between March and October, countless fisheries open and close, hundreds of vessels will traverse the surrounding area and thousands of fishing lines will encompass the outer limits of the project location. Extreme caution and attentiveness are imperative when navigating outside of the Marine Refuge where turbot fishing grounds exist. There is an expectation that proactive consultations with the fishing industry will occur.

There is an admitted direct injury and mortality to benthic organisms, nearby fauna and hence disruptions to feeding and hindrance of defence mechanisms for fish species due to deployment of additional mooring devices (page 27). We do not agree this justifies the claim that there will be minimal disturbance to fish and fish habitat. The ocean is a highly dynamic environment and fish distribution is far from uniform. The effects of these devices on fish populations and distribution patterns are unknown at this time. We are disappointed no follow-up monitoring will

be done on the injury and mortality of fish within the localized project area, on localized suspended solids or disturbances to the seabed as these admitted effects may prove significant to the fishing industry.

It is crucial that effective and regular communication takes place with FFAW throughout the lifespan of these activities particularly due to the seasonality and location. Proactive mitigation will ensure minimal risks. We look forward to building upon the existing channels of communication established with bp thus far.

If you have any questions or comments please feel free to contact the undersigned.

Best regards,



Katie Power
Energy Industry Liaison