

FISH, FOOD AND
ALLIED WORKERS

EARLE MCCURDY
PRESIDENT

P.O. BOX 10, 368 HAMILTON AVE.
ST. JOHN'S NL A1C 5H5
TELEPHONE (709) 576-7276
TELEFAX (709) 576-1521
WWW.FFAW.NF.CA

DAVID DECKER
SECRETARY-TREASURER

Tuesday, May 10, 2011

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 Chevron's North Grand banks Regional Seismic Program, 2011-2017. 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.

To clarify a point made in the document (page 196), fishing gear may only be retrieved from the water by the gear owner (i.e. fishing license holder). This includes buoys, radar reflectors, rope, nets, pots, etc. associated with fishing gear and/or activity. If gear contact is made during seismic operations it should not be retrieved or retained by the seismic vessel. There are conditions that may warrant gear being retrieved or retained if it becomes entangled with seismic gear however so further clarification on rules and regulations regarding fishing gear should be directed to the Conservation and Protection Division of Fisheries and Oceans Canada (NL Region).

Also, to clarify, shrimp harvesting for the inshore fleet generally starts April 1 (not August) and could continue to October (Page 103).

It is important that Chevron maintain regular communication with the FFAW to keep apprised of ongoing developments with fisheries in the project area. Harvesters are spread out over a wide geographic area and communication is vital to the safety of all involved. As stated in the document, "good communication is one of the best ways to minimize interference with fishing activities".

The unknown long term effects of seismic activities continue to concern harvesters. There have been reports from harvesters that fish behavior has been affected following seismic blasts and shellfish have disappeared from areas following seismic work being undertaken. There have also been reports from vessel captains that ground fish catches have been impacted when oil and gas activities have been ongoing. While the research has not determined any direct mortality of fish or shellfish attributable to seismic activity there may be behavioural changes that could affect migration and/or reproductive and spawning activities as well as movement of the exploitable biomass in an area. This, in turn, can impact catch rates in years to come. There is need for further research on impacts of seismic activity on important commercial species including shrimp, crab, turbot and Atlantic cod to address data gaps.

The commercial fishery will be actively prosecuted by FFAW members at the time that Chevron is proposing to conduct its program in 2011 and beyond. While historical fishing patterns have been detailed in the document, fishing activity can change from year to year and during the season as well. As noted in the document the southwest corner of the project area is heavily fished by about 300 vessels in the inshore fleet for crab, shrimp and turbot. (The offshore fleet and other international vessels may also be fishing in the area during the summer months).

In addition to the deployment of a Fisheries Liaison Officer onboard the seismic vessel, to mitigate potential conflicts with fishing vessels and fishing gear (both towed and fixed gear) in the southwest corner of the project area, we recommend the company also consider the deployment of a Fisheries Guide Vessel when they work in this heavily fished area. The loss of fishing time, catch and/or gear that may be associated with gear entanglement in this area may be significant during this prime period so all avenues to mitigate conflicts should be considered.

I thank you for providing an opportunity for the FFAW/CAW to comment on Chevron's North Grand Banks Regional Seismic Program 2011-2017 Environmental Assessment document. If you have any questions or comments please feel free to contact me.

Kind regards,

A handwritten signature in cursive script that reads "Robyn Saunders Lee".

Robyn Saunders Lee
Petroleum Industry Liaison