

# FFAW CAW

## FISH, FOOD AND ALLIED WORKERS

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DAVID DECKER  
SECRETARY-TREASURER

Friday, July 30, 2010

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 Offshore Labrador Seismic Program, 2010-2017. 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.

The commercial fishery is very important to many communities on the south coast of Labrador. While the membership of the Fish, Food and Allied Workers' Union (FFAW/CAW) live in communities as far north as Fish Cove Point (just north of Cartwright), our Labrador members fish in NAFO divisions 2J, 2H and 2G for crab, shrimp, turbot, cod, etc. As well, our harvesters in 4R (northern Newfoundland) have rights to fish in 2J, and our northeast coast fishers still have fishing rights off the coast of Labrador as well. We also have members who fish quotas for the Natuashish Government in 2H.

As such, one of the industry's concerns with a multi-year seismic program being proposed is the need for frequent communication between the industry and the oil and gas company, in this case Chevron Canada Resources. Harvesters are spread out over a wide geographic area and communication is vital to the safety of all involved. There is a need for good planning and further consultation with the fishing industry several months prior to the start of the various components of the seismic program to avoid potential conflict(s) at sea.

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 an example, turbot is becoming more of an important commercial species and many harvesters have geared up to fish turbot in 2010. This fishery uses fixed gear which may introduce more potential interactions between the fishing and oil and gas sectors in the coming years. The fishery is also being actively prosecuted at the time that Chevron is proposing to conduct its program. The peak month for shrimp landings within the project area is June, the peak time for harvesting snow crab is July and August and turbot fishing peaks in August and September. It is therefore important that Chevron maintain regular communication with the FFAW to keep apprised of ongoing developments in the fishing industry.

The unknown long term effects of seismic activities continue to concern harvesters as well. 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 groundfish 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 it needs to be recognized that 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. While Atlantic cod is not a significant commercial species in the project area some stocks do migrate off the Labrador coast during the time that Chevron proposes to conduct its activities. There is a possibility that seismic work may induce some behavioural changes in the stock(s).

Further to this, several companies have, or are in the process of indicating their interest in conducting seismic programs over the same timeframe as Chevron. The potential for seismic surveys to be conducted concurrently increases the risk for potential conflicts with fishing vessels and gear. This also increases the potential impact of seismic activity on important fish and shellfish resources.

To mitigate potential conflicts with fishing vessels and fishing gear (both towed (p. 127) and fixed gear) we recommend the company utilize a Fisheries Liaison Officer during the various seismic activities proposed. Fisheries Liaison Officers (FLOs) have experience with vessel traffic and gear deployment and are effective at providing a communication platform for the fishing industry during seismic programs. They are also trained as Marine Mammal Observers.

I thank you for providing an opportunity for the FFAW/CAW to comment on the Chevron's Offshore Labrador Seismic Program 2010-2017 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".

Robyn Saunders  
Petroleum Industry Liaison