

From: Robyn Saunders [rsaunders@ffaw.nfld.net]  
Sent: Wednesday, February 10, 2010 4:49 PM  
Subject: ConocoPhillips 2010-2013 Seismic Survey Program

I'd like to make a few comments on the ConocoPhillips Canada Laurentian Subbasin Offshore Area Seismic Survey Program 2010-2013 Environmental Assessment document.

The commercial fishery is very important to many communities on the south coast of Newfoundland. Fishing activity occurs throughout the year and a fair amount of this activity occurs on the slope of the continental shelf.

As can be seen from the various descriptions, tables and figures included in the document there are multiple species harvested. No dollar figures were placed on annual catch in the study area but an average of 8604 tonnes (Table 4.4) of landed product for a three year time period is significant for the industry as a whole. More importantly, this is significant for the many people living in our coastal communities who are employed in the fishery.

There have been serious concerns brought forward by harvesters about the crab resource in 11Sx (western side of the St. Pierre channel) that "disappeared" for several years following seismic work in the area in 2004 and/or 2005. The crab resource seems to have rebounded in 2008 and 2009 but there were at least two years (2006 and 2007) when they were unable to fish in the area (11Sx) following seismic work being undertaken. This concern has been noted in the report (p. 161). There is an inherent fear among harvesters that should seismic work proceed again near crab grounds that the crab resource may again disappear.

As well there have been reports by harvesters that fish behavior has been affected following seismic blasts. While the research has not determined any direct mortality of fish attributable to seismic activity it needs to be recognized that there may be behavioral changes that could affect migration and/or reproductive and spawning activities that could impact the fishery in the future. Given the unknown long term effects of seismic activities these concerns are valid.

In terms of timing of the seismic program we recognize that there is a narrow window of time for the company to acquire a seismic vessel and conduct their program while the weather is still reasonable. However, the period of time from May to October, when the seismic work is being proposed, is very busy for the inshore fleet. (In addition to commercial fishing activity an industry crab survey, a collaborative project between the FFAW and DFO, is conducted in the fall of the year in the area as well). To mitigate potential conflicts with fishing vessels and fishing gear we recommend the company consider utilizing a fishing industry guide vessel as well as a Fisheries Liaison Officer during the program.

I have been in contact with the company over the past year and expect to learn more of their seismic program in the coming months. Should they decide to go ahead with their

program in 2010 they have committed to another meeting with harvesters in the area. I have also addressed the crab resource disappearance concerns with the company and will mention the issues related to the proposed timelines for the seismic work.

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

Kind regards,

Robyn Saunders  
Petroleum Industry Liaison  
Fish, Food and Allied Workers Union  
Phone: (709) 576-7276  
Fax: (709) 576-1521  
Email: [rsaunders@ffaw.nfld.net](mailto:rsaunders@ffaw.nfld.net)