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Thursday, July 27, 2017

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
St. John's, NL A1C 6H6

Re: Western Newfoundland 2017 Controlled Source Electromagnetic (CSEM) Survey – Environmental Assessment

Dear Mr. Hicks,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/Unifor) with the opportunity to comment on the Environmental Assessment of EMGS's Western Newfoundland 2017 Controlled Source Electromagnetic Survey. Our comments are focused on a few aspects of the document that are mainly points of clarification.

Page 3.1 – There are strong indications from science that redfish and other groundfish resources are on the rise in the Gulf. On the west coast there has been a significant increase in Atlantic halibut, which is harvested by long line (not haddock).

Page 3.2 – FFAW-Unifor members do not generally use trawl gear for the species that have been fished in the project area. An exception would be redfish but a fishery for redfish in 2017, if opened, would be limited.

Page 5.53-5.57 – As the Potential Redfish Mating Area (September-December) overlaps with the Project Area (September-October) with respect to timing, further information regarding how the project may impact redfish mating is warranted in this assessment.

Page 6.1 – While we recognize it is unlikely that there would be interaction between the fishery and receiver deployment and retrieval due to the mitigation measures proposed (i.e. FLO onboard, Notice to Shipping, etc.) there is still a potential for interaction and it should be noted as such in Table 6.1.

Page 9.3 – It is understood that the receiver bases that are left on the ocean floor following the survey are designed to disintegrate in about a year. Has the proponent returned to a survey site and done testing to confirm that this is the case? There is a potential concern that a commercial fish harvester could hook a receiver base for example in the spring or summer next year (2018). Have there been any incidences of this occurring in other jurisdictions?

Appendix C Figure 2 – Is this information for Greenland halibut (also known as turbot)?

Appendix C Figure 7 – The species predominately fished in Newfoundland and Labrador is snow crab *Chionoecetes opilio*. It may sometimes be referred to as queen crab in the market.

FFAW/Unifor would like to thank you for providing an opportunity to comment on this EA. If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
