



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

Lisbon, the 10th of April 2014

Subject: **Comments on the Draft Eastern Newfoundland Strategic Environmental Assessment Report**

To whom it may concern:

This letter is submitted on behalf of the **Long Distance Fleet Regional Advisory Council (LDRAC)**. And first of all, let me please introduce briefly who we are:

The LDRAC was created in 2004 by the EU Council of Ministers as a way of guaranteeing the wide participation of the EU stakeholders been interested in the processes of elaboration and implementation of the external dimension of the Common Fisheries Policy. It is composed by representatives of the fishing sector as well as other interested groups such as NGOs, Trade Unions, Women networks, etc., whereas the representatives of the scientific world are invited to inform in the meetings of the RACs as experts. The European Commission and EU Member States representatives are present in the meetings as observers. The main tasks of the LDRAC are to advise the European Institutions on questions concerning to fisheries Agreements between the EU and third countries, relations with the Regional Fisheries Management Organizations (RFMOs), international fishing markets and Trade, as well as to contribute to the implementation of the common fisheries policy outside Community waters and to improve the external relations of the EU in fisheries matters.

Regarding the subject, I would like to rise that the LDRAC is of the opinion that the **Eastern Newfoundland Strategic Environmental Assessment Report (EN SEA) is incomplete in the areas of influence of offshore oil and gas operations on the marine environment, and on the living resources of the sea – especially commercial fish stocks.**

From the perspective of LDRAC, the most important part of the analysis is how will the anticipated oil and gas operations influence the state of environment, especially in the Vulnerable Marine Ecosystems (VME) and in turn how will this affect commercial fishery. In this respect, LDRAC supports the responses given by the European Commission and by NAFO.



Particularly important would be to make an analysis:

- a) how will oil and gas operations affect VMEs;
- b) if the oil and gas operations will be performed in the VME protection areas;
- c) if performed outside of these areas, will the distance be enough to safeguard the VMEs in question;
- d) what is the relation between VMEs and commercial fishery;
- e) how will oil and gas operations affect the state of fishing resources;
- f) how will oil and gas operations affect the fishing activities.

Therefore, we ask you to consider the following questions:

- a) What steps will you take to monitor the influences as described above?
- b) What measures will you take to mitigate the adverse influence of oil and gas operations on the marine environment?
- c) Will you set up a compensation plan for the affected parties for the loss of access to fishing grounds and for deterioration of the state of fishing resources?

Analysis of data provided by the NAFO shows that some of the current calls for bids coincide with the VME protection areas. Since the VME protection areas are closed for fisheries to protect the habitats of their living organisms, we understand that it would be desirable to reflect what risks any oil and gas operations in the same areas would pose to these habitats.

Since VMEs protection is a priority in itself, a further analysis should be made as to what distance should be maintained between a VME and an oil and gas operations site.

From the data collected by the NAFO it is clear that the fishing activities in the study area tends to be geographically close to the VMEs. 50% of all fishing takes place within 10 km of VME protection areas and 80% of fishing – within 50 km of them.

This shows that there is some link between the VMEs and the state of fishing resources. What exactly are the mechanisms of mutual influence is yet unknown. This calls for a deeper analysis and understanding – and at the same time for precautionary approach.

NAFO data shows that most of the fishing occurs in a short distance of VME areas borders. Any oil and gas installations require an area where no fishing may take place. If such areas are in



places where fishing is especially intense, it is clear that any oil and gas operations in these areas will have disproportional influence on fisheries.

Yours sincerely,



President of the LDRAC