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Wednesday, September 8, 2021

Bay du Nord Development Project  
Impact Assessment Agency of Canada  
901-10 Barters Hill  
St. John's, NL A1C 6M1

**Re: Bay du Nord Development Project Environmental Assessment Report and Potential Conditions - Public Comments**

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments on Equinor's Bay du Nord Development Project Environmental Assessment Report (August 2021). FFAW-Unifor represents approximately 15,000 working women and men throughout Newfoundland and Labrador, most of whom are employed in the fishing industry.

As mentioned from the review of the previous EIS document, the scope of this development project is much larger than other exploratory drilling projects that have been recently reviewed. It is concerning to FFAW-Unifor members that there has been little public engagement regarding this project, other than the opportunity to submit online comments during the public review periods. It is unfortunate that the document review periods have coincided with a global pandemic. ***This is a 30-year project and it warrants more in-person public engagement.***

Again, it needs to be mentioned that the ocean is a highly dynamic environment and there will likely be changes in the Flemish Pass ecosystem over the lifespan of this proposed project. While the assessment notes that there is limited fishing activity in the core development area for the project, the fishery could change over a 30-year period. Therefore, predictions that are made in 2021 determining that a project will or will not result in significant adverse effects on the commercial fishery, for example, may require reconsideration in the future. This is particularly concerning for the future wells proposed in unknown areas outside of the core development area. ***It is recommended that further environmental***

***assessment of "future" wells outside of the core development area be required, once their locations are known.***

It is noted that there has been direction by the Agency for the proponent to consult with the commercial fishing industry throughout the proposed project. The joint development of a communication plan at the onset of this project, if it were to proceed, would foster discussions such that the proponent was aware of changes in the fishing industry as well as provide a forum to examine concerns/issues as the project proceeds.

It was also noted in this document that the proponent will be required to conduct baseline studies, monitoring and follow-up programs throughout the lifespan of the project to test predictions. This element was missing from the previous EIS document and the requirement is fully supported by the fishing industry. It is hoped however that the proponent still plans to hold discussions with stakeholders regarding the habitat offsetting program, as stated in the EIS. The fishing industry would like to be consulted on proposed communications fibre optic cable installation as well.

There are many elements of this development project that could impact the fishing industry cumulatively. Effective communication between the proponent and the fishing industry will be critical.

Thank you for the opportunity to provide comments on this project. If you have any questions or comments, please feel free to contact the undersigned.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

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