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Tuesday, September 29, 2015

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

Mr. Hicks,

Re: **ExxonMobil Canada Ltd. Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Programs, 2015-2024 Environmental Assessment**

Thank you for providing the Fish, Food and Allied Workers (FFAW|UNIFOR) with the opportunity to comment on the Environmental Assessment for ExxonMobil's Eastern Newfoundland Offshore Programs, 2015-2024.

FFAW-Unifor engages in reviews and consultations with the petroleum industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador (NL). At our initial consultation meeting with ExxonMobil in March 2015 our discussions were very general as this EA runs over an extensive time period and geographic area. Our ocean environment is constantly changing. As such, it is imperative that the proponent continue to engage FFAW-Unifor and its members throughout the life of this Environmental Assessment to ensure there is a thorough understanding of commercial fishing activities and trends as well as fisheries research survey endeavours from year to year. Consultations with fishing interests should be planned in the first quarter of the year, prior to the start of the typical fishing year.

Additionally, there are a few specific items in the document that FFAW-Unifor would like to comment on:

- Page 55 & 68 – Although the general trend indicates that snow crab stocks declining it is important to note that this does not appear to be the case in 3L, the NAFO Division where the bulk of the Study Area falls.
- Page 60 – Qualifying the statement “benthic invertebrates are the biggest contributors to commercial landings” by adding “currently” is warranted.
- There are several instances within the report that lump several NAFO Divisions together improperly. Divisions 3N, 3L, 3O and 3Ps would be abbreviated 3LNOPs as used by the fishing industry, not 3NLOPs.
- Page 202 – Please qualify the discussion on the cod moratorium. There are several commercial fisheries for the species in NL and it is an important component of many

fishing enterprises. Additionally, groundfish stocks are increasing such that there will be larger-scale directed fisheries in the near future. Stating that the moratorium for cod is "still substantially in place" is misleading. The sentence following does not adequately capture the expected resurgence.

- Page 202 – Please provide the reference for the inference that the downward trend in shrimp "could possibly be a result of the fisheries closure in Division 3M in 2010."
- Page 204/205 – There should be some indication in the text that the maps are displaying data from 3KLMN only. The text is misleading in that it states it is commercial fishing activity within and adjacent to the study area. However, 3Ps and 3O in particular are also adjacent to the study area.
- Page 244 - MCTS Centres are located in Placentia, Port aux Basques and Goose Bay.
- Page 254 & Page 295 – The **FLO** onboard the seismic vessel is tasked with directly communicating with fish harvesters on the water. This is not the role of the crew of the standby or guard vessel.
- Page 294-295 – As the proponent is unsure of its detailed and specific operation plans for the proposed work it is critical in planning that consultation should be done in the first quarter of the year.
- Page 295 – The level of potential interaction or disturbance at any particular site and time may be minimal, as stated. However, it is highly dependent on the time of the year. The window of opportunity for exploratory oil and gas programs often coincides with peak fishing times. Avoiding active fishing areas is of utmost importance.
- Page 296 – Anecdotal reports from harvesters who have been actively fishing in areas where seismic surveys were being conducted would disagree that seismic sound would have no effect (N) on marine fisheries. As such, it is suggested that the magnitude reported in Table 5.17 should be low (L) or medium (M). It is reported as low (L) in Table 5.3 on page 265.

Overall the document is very non-specific in terms of the actual project that is planned over a ten-year period. As such, it is challenging to comment how the work will impact commercial fishing or the environment over the timeframe.

It remains of utmost importance that the proponent keep FFAW-Unifor informed of its planned activities in the coming years. This recommendation extends to vendors that may be conducting work on behalf of the proponent.

Thank you for the opportunity to provide input on this environmental assessment.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
