



---

**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

---

Friday, September 22, 2017

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

**Re: Fugro Offshore Seafloor and Seep Sampling Program (2017-2027)  
Environmental Assessment - Addendum**

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 Addendum of Fugro's Offshore Seafloor and Seep Sampling Program (2017-2027).

The Key Mitigation Measures section (2.7) has been edited in the Addendum to include discussions with FFAW/Unifor regarding the use of Fisheries Liaison Officers (FLOs). The initial document stated that a FLO would be on board the survey vessel. The Addendum indicates that the use of a FLO will be based on time and location of survey activities in relation to the level of fishing activity.

The deployment of Fisheries Liaison Officers (FLO) on offshore petroleum industry survey programs is considered a standard practice of mitigation to prevent potential at-sea conflicts associated with time and space overlap between fishing and petroleum sectors. The use of FLOs for similar seafloor and seep sampling projects in the past has been a key component of their mitigation measures.

The area of interest of the proponent's program is fairly large, although understandably smaller than the area put forward in the EA. As well, more than half of the area extends beyond the 200 mile limit. There is turbot fishing currently ongoing at the southern edge of the program area (inside the 200 mile limit). The real-time data we have available on fishing activity outside the 200 mile limit is very limited. Our groundfish stocks are on the rise and the latest data available is from 2015. (Groundfish fishing activity between 2011 and 2015 is depicted in the EA in the program area in Figure B.3). As such it is difficult to

---

---

predict the level of fishing activity in the area of interest while the survey program is ongoing this fall.

Due to the spatial scale and uncertainty on the level of fishing activity in the program area at this time it is my recommendation that FLOs be deployed on both vessels for this project.

FLOs are experienced in initiating and maintaining communication with fish harvesters at-sea to gain insight on fishing activity and share details of the survey program. This at-sea communication enables the FLO to collaborate with the onboard Client Representative and senior vessel crew to ensure effective planning and mitigate potential conflict on the water.

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

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

---