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Darren Hicks
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Canada-Newfoundland and Labrador Offshore Petroleum Board
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Mr. Hicks,

The Fish, Food & Allied Workers (FFAW|Unifor) would like to respectfully submit the following comments in connection with **GX Technology Canada Ltd.'s GrandSPAN 2D Seismic, Gravity and Magnetic Survey, 2014-2018, Environmental Assessment**. The FFAW|Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland & Labrador. While the FFAW|Unifor is generally supportive of proposed projects helping to stimulate the provincial economy, we must balance that support with the responsibility to protect the interests of our members, fish harvesters and plant workers, and the health of the ocean for future generations.

The commercial fishery is very important to the many rural communities in Newfoundland & Labrador. While the membership of the FFAW|Unifor live in communities as far north as Fish Cove Point (just north of Cartwright), our members fish in NAFO divisions 2J3KLNOPsn for variety of species.

There are a few items in the document that the FFAW|Unifor would like to comment on:

- Page 9: First paragraph, it is common sense that exploration would be a key element of the development of any offshore petroleum industry.
- Page 10: section 2.3 "As an important and valuable planning tool, (this) EA is ..." the word *this* is missing in the sentence.
- Page 12: The FFAW|Unifor does have great hesitation with the potential GrandSPAN Seismic Line Layout, as it covers an area of such magnitude with lines going over many of the major fishing grounds in Newfoundland and Labrador waters.
- Page 14: There should be no interference or impact on active fisheries or fisheries science activities, see Appendix 2 of C-NLOPBs *Geophysical, Geological, Environmental and Geotechnical Program Guidelines*. Further, the FFAW|Unifor would suggest that communication with fishing vessels should go through the Fisheries Liaison Officer and not the support ship as per what is in the One Ocean Seismic Program Protocol and Fisheries Liaison Officer video developed by the Canadian Association of Petroleum Producers.
- Page 32: The first sentence of section 3.3 would read better and more appropriately: "EAs focus on components of the environment that are of particular ecological and/or social

importance, which have potential to be affected (adversely or positively) by the proposed ...”

- Page 76: Looking at the text discussing Figure 4.16 it is not wholly accurate to suggest “that Northern shrimp are concentrated in the northeast portions of the Study Area”.
- Page 79: Figure 4.18 and discussion on page 76 about Snow Crab relies on the DFO RV Trawl Survey, although the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab has been found to be more reliable when it comes to the estimation of abundance.
- Page 214: It would be warranted to discuss the value of Newfoundland and Labrador shrimp as compared to the Canadian value.
- Page 215: The review would suggest removal of the word *under* when talking about the 17 offshore shrimp licences. Industry-designated trip limits and harvesting caps are set each year depending on the Total Allowable Catch. These measures also vary depending on time of the harvesting activity. It is not accurate to source an 11 year old document when it comes to an annual adjustment made to the fishery. Further, at-sea observers are exactly this: observers who record and report at sea.
- Page 216: In the discussion on Atlantic Cod there is no mention of the sentinel and stewardship fisheries for cod that take place through-out the province.
- Page 249: Harvesters and DFO scientists have strong evidence that we are already in a much warmer oceanographic regime, compared to the situation of the early 1990s. Further, when talking about future fisheries in the context of changing climatic circumstances, a discussion about the fisheries on the Ground Banks before 1990 would have been warranted.
- Page 253: FFAW|Unifor would have liked to see the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab stations depicted together with the potential map of the program used earlier in the document.
- Page 270: FFAW|Unifor must indicate that what was proposed as a quiet time before the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab in the Environmental Assessment for LabradorSPAN remains inappropriate for implementation.
- Page 276: There has been no agreement as to any temporal separation plan between a Seismic Program and the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab. FFAW|Unifor has been asking proponents to provide evidence of where suggested 7 day separations come from. All that has been coming back is that it was accepted in the past or that DFO accepts it for the RV Trawl Survey. It remains that the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab involves the surveying of approximately 1,500 stations utilizing commercial harvesting vessels and commercial gear. As it stands it is untenable to do firm scheduling on this as the scientific licences are not issued until September and the harvesters participating cannot be active on a commercial and a scientific licence at the same time.
- Page 296: Harvesting activity and its impact on mortality and habitat is managed with the guiding principle being the precautionary approach. When it comes to introducing Seismic Programs on the fishing grounds it is only fair to expect that the same principle be followed with regards to the potential of impact on species abundance and/or behaviour.
- Page 299: Looking at Appendix 2 of C-NLOPB’s *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* it is clear that there should be no such interfering from seismic activity on fisheries or fisheries science.
- Page 302: Again the 7 day temporal separation has likely only been discussed in a positive context for the DFO RV Trawl Surveys that take place. It is not viable to use temporal separation for the Industry-DFO Collaborative Post Season Trap Survey for Snow Crab.

- Page 340: *Important* is a relative adjective that could appropriately have been left out. “The Project will contribute new information ...” would have been an adequate beginning to the paragraph.

There is a recurring mention within the Environmental Assessment about the utilization of a 7 day temporal pre-research survey separation. It is the understanding of the FFAW|Unifor that this is being accepted by DFO when it comes to their Spring and Fall Research Vessel Trawl Surveys, but it is not feasible to be utilized in connection with the execution of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab. If there are further questions on these matters it would be worthwhile to communicate with the shell-fish research scientists at DFO. The reviewer would suggest that in the document when there is any mention of the 7 day temporal separation, it **must** specify what science context this applies. Any possible impact, be it negative or positive, on the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab cannot be accepted.

The FFAW|Unifor and all the affected fish harvesters and plant workers are eager to work collaboratively with GXT to ensure that everyone shares the prosperity hoped to be created from petroleum exploration and harvesting activities. I thank you for providing an opportunity for the FFAW|Unifor to comment on the **GX Technology Canada Ltd.’s GrandSPAN 2D Seismic, Gravity and Magnetic Survey, 2014-2018, Environmental Assessment**. If you have any questions or comments please feel free to contact me.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison