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FISH, FOOD AND  
ALLIED WORKERS

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EARLE MCCURDY  
PRESIDENT

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P.O. BOX 10, 368 HAMILTON AVE. ST.  
JOHN'S NL A1C 5H5  
TELEPHONE (709) 576-7276  
TELEFAX (709) 576-1521  
WWW.FFAW.NF.CA

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DAVID DECKER  
SECRETARY-TREASURER

Thursday, June 13, 2013

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

Re: Hebron CSR Addendum

Mr. Hicks,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with ExxonMobil Canada Properties (EMCP) (together with its partners) **Hebron Project – Comprehensive Study Report Addendum**. The FFAW actively engages in reviews and consultations with the Petroleum Industry on behalf of our membership throughout the province of Newfoundland & Labrador. Thank you for providing the **Hebron Project – Comprehensive Study Report Addendum** for review. While the FFAW 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.

By virtue of submitting an addendum it would have been appreciated if fisheries data was included with the Amended Offshore Project Area. This is particularly pertinent as the change is of significance, and the document fails to supply any of the data. Looking at the EA Update which was submitted in May 2013 it is evident that there is harvesting for Snow Crab taking place within what is now the Amended Offshore Project Area (See Figure B-2 in EA Update). In light of this, the FFAW would suggest that consideration be given of this matter for what is submitted in the Comprehensive Study Report Addendum.

Looking at page 4 of the Addendum it is indicated that there would continue to be not significant effects predicted from the activities of having 12 rather than 10 streamers. It is given that with an increase turning radius and the mitigation effort required for Marine Mammals, the range of the exposure to the sound signature will be expanded. The FFAW has invariably highlighted the concerns that there have been repeated observations by harvesters that seismic activity has a negative impact on the catch rates experienced in Newfoundland & Labrador waters.

On page 5 of the Hebron Project comprehensive Study Report Addendum, there are a few items that stand out and need to be addressed. What is being called the DFO post-season crab surveys in the document should in fact be referred to as Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab. The text goes on to reference the DFO-Industry Post-Season Crab Survey with Figure 5-1, the problem with this is that there is a disconnect between text and depiction. The DFO-Industry Post-Crab

Survey uses fixed locations for surveying, what is depicted and described in Figure 5-1 are vessel transects – it is suspected that what is depicted are DFO-RV trawl surveys, but without knowing the FFAW cannot be certain in this. Furthermore, the text is listing the post-season crab survey to have started on August 29<sup>th</sup>, 2012 DFO did not issue the scientific licenses for the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab until September 1<sup>st</sup>, 2012. Relating this to the EA Update submitted to the Canada-Newfoundland & Labrador Offshore Petroleum Board on May 2<sup>nd</sup>, 2013, the last paragraph of page 8 was never linked to the depiction in Figure B-9 in the Appendix – this has in effect been in the Study Report Addendum.

Based on the above there is clearly a disconnect within the document and there is an apparent failure to distinguish between the variety of fisheries science taking place in Newfoundland & Labrador waters. As industry is involved in some of the science work that is taking place (particularly the DFO-Industry Post-Season Crab Survey), EMCP would be advised to contact both DFO and FFAW Science divisions to clarify the discrepancies identified. In addition, the FFAW would suggest that as there is currently a process underway to have a Strategic Environmental Assessment done for Eastern Newfoundland, it is warranted to not issue further changes to what is taking place in the area until after the conclusion of the Strategic Environmental Assessment. The FFAW is always welcoming proponents and the C-NLOPB for further communication on issues that are raised either during consultations or through document reviews.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison