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

Having reviewed to responses to the comments that the FFAW submitted to the C-NLOPB regarding Husky Energy Atlantic Region's Environmental Assessment Review document, I respectfully provide the below follow up observations.

The reason for the FFAW to mention the topic of expanding to the north of the White Rose field was not purely tied to the White Rose project, but implied expanded petroleum activity in the area north of the current producing field. Husky Energy readily indicates and depicts that EL 1090R (Glenwood) is in fact north of the White Rose field, hence implicating that to the FFAW context is counter to that which was stated at the October 9th, 2012 meeting.

The proponent suggests that there is little snow crab harvest in the area is not a sufficient reply to the concerns raised by the FFAW. Looking the current quota reports the harvest in the 3L offshore harvest there are still 15% left to harvest, this is in addition to the shrimp harvest which is taking place. Although the proponent has plotted the snow crab harvest in the response to comments, there is no mention of the shrimp harvest – shrimp landings for the 3L fleet currently stand at 5%. As per the information that the FFAW has the southeastern point of what is often referred to as the shrimp triangle is at 47.1N and 47.75W (based on data compiled 2005-2010). The traditional limitation on the eastern limit was the 200nm Canadian Exclusive Economic Zone – this has changed for the 2013 harvesting season allowing Canadian vessels to harvest outside 200nm. The result of the change to the harvesting regulations would likely suggest that what is now the eastern edge of the shrimp triangle would/could stretch further east and south. Looking further at what the proponent has submitted with the response to comments it is clear that the majority of harvest taking place within EL 1090R is in fact in the spaces indicated as priority and contingent – if the two figures in fact represent the same scale and space (there are distinct differences in the 'triangles' presented).

With regards to the Industry-DFO Post Season Trap Survey for Snow Crab, the FFAW is of the opinion that there should not be seismic activity on the harvesting grounds between the commercial harvest and the scientific survey. It is of importance that there not be any interfering factors on the species distribution or abundance prior to the Industry-DFO Post Season Trap Survey for Snow Crab, as it can have a significant economic impact on the fishing fleet, both in the near and in the long term.

It is difficult for someone reviewing submitted documentation to provide a holistic response when what is being submitted fails to clearly indicate where the activity is to take place – this was the case with the initial submission. When the proponent prepared their response to the comments, they would be well served to provide the planned activity overlaid on a map together with the harvesting data – not only one species.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison