

FFAW Comments

Husky White Rose Development Project: New

Drill Centre Construction and Operations

Program Environmental Assessment

5.5.3.2 Atlantic Cod “The Northern Cod has been called one of the least productive of the major cod stocks (Brander 1994)” This statement seems to downplay the importance of Northern Cod. Updated information on cod should be used here.

Cod boxes should be illustrated on figures/maps, i.e. *Hawke Channel & Bonavista Corridor*. A map is needed on page 54, or at least make reference to one.

6.6.5 Will an estimate for seismic activity for 2007 be available in time for the final draft of this document?

6.8 Effects of the Environment on the Project. This section is much too brief, should be a key component, considering the great challenges involved with our environment. Despite the brief description in Section 4, the extreme and severe weather conditions experienced are understated.

Table 7.9 Small Transfer Spills. Small transfer spills have a frequency of 5 (more than 200), yet this is ranked negligible. BOP fluid is released at a frequency of 6 (continuous), and is also *negligible*. How can this be overlooked and why is the number of releases out of control? Perhaps EA should include sea state limits or conditions suitable for this frequent, troublesome procedure.

Table 7.4 Supply Boats sound levels are not included for normal operation. This only shows the changes from the extra use of propeller nozzles and bow thrusters. There is no level presented to compare with other vessels and installations.

7.4.2 Synthetic Based Muds supposedly “biodegrade relatively rapidly in certain conditions.” Expand on this, outline ideal conditions.

7.6.1.5.5 Cumulative Effects. Final paragraph downplays effects by comparing the affected area to the total area of the Grand Banks. This is not necessary to make cumulative effects deem/seem *not significant*.

7.6.2.1 Presence of Structures. This little section is a waste of space. These safety zones are certainly no safe haven for fish, nor would the presence be a *positive effect*.

7.6.2.4 Flaring. Small spills occur quite frequently in flaring operations. According to Figure 7.9, the occurrence is over 200 times a year. However, this is considered *negligible*.

7.6.2.11 Underwater Maintenance. This section refers back to previous tables, illustrating that ROV work is has a frequency of less than 11 times a year. Does this number reflect the frequency of actual maintenance from past experience? How often are ROV's used for observation purposes?

Table 7.17 Why is there a question mark in this table for frequency of BOP Fluid? In Figure 7.9, the frequency shows: 6-continuous.

In some sections, a list of organizations is inserted to show who was involved in consultations. Some of these lists present One Ocean and the Fish, Food and Allied Workers on the same line. Please separate those two organizations in *all* sections.

Maps are used quite often in the document, but they are usually hard to read or interpret. These maps should be larger (as a double page fold-out) to be much more effective.

Anchorage of a rig is not discussed, demonstrating the size, type and number of anchors typically used. This would be interesting to know to add to the disturbance or dredging of the sea floor from certain styles of anchors and chains.