
FISH, FOOD AND
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Canada-Newfoundland and Labrador Offshore Petroleum Board
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Mr. Hicks,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with **Hibernia Management and Development Company's Seismic Program for the Hibernia Oil and Gas Production Field 2013-end of the life of the field Environmental Assessment**. The FFAW 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 is generally supportive of economic opportunities presented to the province through the development of petroleum resources, we have to balance that support with our responsibility to protect the interests of our fish harvesters and plant worker membership and the health of our ocean for future generations.

In light of the Study Area involving or being precariously close to some of the most fruitful harvesting grounds for members of the FFAW, both for Shrimp and Snow Crab. Further, considering the changing environmental circumstances and species composition, the FFAW would suggest that having an Environmental Assessment covering seismic '2013-life of field' is not tenable.

With environmental changes there will be changes to where species are harvested. For Snow Crab this could cause harvesting taking place in shallower water as the water on the Grand Banks plateau is expected to remain cold as there as some deeper waters come to have higher temperatures.

Looking at page 56 it is indicated that harvesting and seismic activities might overlap in space and time. This would not be acceptable for the FFAW – seismic activity should not be pursued on active fishing grounds. Further regarding page 56, there was no indication that Ocean Bottom Cables would be used in the 2013 program, whereby the indicated discussion should not be pertinent for the 2013 discussion as is indicated.

Moving to page 59 the concern of conflict should not be confined to gear, there is a real concern amongst harvesters that seismic activity has an impact on catch per unit effort or it changes a species distribution. A change to distribution during a season incurs significant costs for harvesters – likewise do potential decreases in catch per unit effort. The FFAW also believes that there should have been a stronger reference in the document with regards to the opening on fisheries – the reference used is personal communication with a proponent staff member.

Looking at references to Figure 4.23, there should have been given a greater context to what is being depicted. It would be pertinent to note the timing of who fishes where and when. The cause of the volume harvested in January and February is due to the offshore fleet not having access to northern grounds at that time of year. However, there is not note of such facts in this document as far as the FFAW reviewer can note.

With regards the discussions on seismic activity and fisheries science (i.e., page 63 and pages 136-37), the FFAW maintains its stance that there should be no seismic activity on or near the Industry-DFO Collaborative Trap Survey for Snow Crab locations until said locations have been completed. As this scientific survey is a collaborative effort it would necessarily require consultation with both entities pursuing the research. The document suggests that DFO was consulted on something of this nature in 2002 and these consultations then necessarily still apply. However, the FFAW was not brought into the discussions around the suggested temporal and spatial separation plan in 2002. The research locations have been the same since the beginning and it is paramount for the scientific integrity that these remain such, especially due to the importance it can have on the future economics for the harvesting fleet.

Further to the fisheries science, in the discussion on Cod (page 37) there are scientific opinions that differ from the perspective portrayed in the quoted DFO reports. Independent science has indeed argued/showed that there are in fact regions with significant spawning biomasses. Further, there is disagreement as to what is to be considered as an acceptable return in the biomass.

The FFAW and all the affected fish harvesters are eager to work collaboratively with HMDC to ensure that everyone shares the prosperity hoped to be created from both seismic and harvesting activities. I thank you for providing an opportunity for the FFAW to comment on this document. If you have any questions or comments please feel free to contact me.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison