

**FISH, FOOD AND  
ALLIED WORKERS**

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DAVID DECKER  
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Monday, May 7, 2012

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 4th Floor  
St. John's, NL A1C 6H6

Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the opportunity to comment on the Environmental Assessment of Husky's Jeanne d'Arc Basin/Flemish Pass Regional Seismic Program, 2012-2020. I'd like to comment on a few aspects of the study that are representative of issues and concerns from the fishing industry, namely the members of the FFAW/CAW.

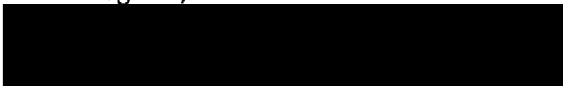
A consultation was held with fish harvesters during the development of this Environmental Assessment in December 2011. It should have been noted in the EA that harvesters are equally concerned about the impact of seismic surveys on the snow crab resource. (Only concerns related to the impacts of seismic surveys on the shrimp resource were mentioned in the EA, pages 183, A-81-83). This is an important point as the 2012 plans for Husky involve seismic on/near important crab fishing grounds for 3L fish harvesters. Harvesters specifically requested at the consultation in December that seismic not be conducted until after the snow crab season in the area has closed (approximately August 10<sup>th</sup>). A follow-up meeting in March 2012 was held with the operator once they knew their area of interest for 2012 and concerns related to the snow crab resource were stated again by harvesters at that time.

Further to this, if seismic work is conducted on/near crab fishing grounds while the area is being heavily fished there is significant potential for gear conflict. As stated in the EA, "the chief means of mitigating potential impacts on fishery activities is to avoid active fishing areas, particularly fixed gear zones" (page 210). The loss of fishing time, catch and/or gear that may be associated with gear entanglement in this area may be significant during this prime period so all efforts to mitigate conflicts should be used.

The overall study area for this EA is quite large but there is considerable fishing activity in the area. While historical fishing patterns have been detailed in the document (page 134) fishing activity can change from year to year and during the season as well. It is very important that Husky maintain regular communication with the FFAW to keep apprised of ongoing developments with fisheries in the project area throughout the duration of this Environmental Assessment (2012-2020).

I thank you for providing an opportunity for the FFAW/CAW to comment on this EA. If you have any questions or comments please feel free to contact me.

Kind regards,

  
Robyn Saunders Lee  
Petroleum Industry Liaison