

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 for the **Husky Energy Atlantic Region Newfoundland and Labrador Offshore Area Environmental Assessment Review for 2013** distributed on May 23rd, 2013. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

It is important for the FFAW to note that the fact that Husky Energy is now looking to pursue a well site survey for Exploration Licence 1090R. The reason for this to be pointed out is that during the consultation sessions for the White Rose (West) Expansion Project, it was brought up by harvesters that there would be a concern if the company were to pursue drilling to the North of the White Rose Field. The following paragraph is from the FFAW submission for the White Rose Expansion Project.

In the consultation session with the Offshore Harvesters, one fisherman raised an issue with regards to the possibility of the petroleum activity within the White Rose Field expanding to the Northeast. If this were to take place it would have a direct impact on some of the most fruitful snow crab harvesting grounds. This was brought up as the diagrams showing the White Rose field with new drilling centres had one listed to the Northeast of the current North Drill Centre (Figure 2-15 and/or Figure 2-16). At a subsequent meeting on October 9th, 2012 between the Husky Energy and the FFAW (One Ocean was also present) Husky was indicating that any expansion towards the Northeast was not within the horizon, and there are currently no plans to pursue anything in this area. Nevertheless, when the Environmental Assessment was sent out for review this is still listed in the figures listed above. Further to this, it is mentioned that offshore harvesters were concerned that the extension in to the west of the White Rose field would go into snow crab grounds (Section 6.2.2.2). This is factually inaccurate, the concern raised by the harvesters was about extending to the north, there is very limited harvest taking place to the west of the White Rose field as evident from the (limited) information presented in Figure 9-28. Husky Response: Comment Noted. Thank you.

For the FFAW this is an insufficient manner in which to deal with this topic. Effectively, the planned well site survey engages seismic activity into one of the most productive snow crab grounds, at a time when there concern about the impact seismic might have on fisheries. Further, the FFAW has maintained, and

continues to do so, that there should not be seismic activity in areas where the Post-Season Snow Crab Survey takes place. There is a concern that the seismic activity could have an impact on the survey, which in turn could have economic impacts for the harvesters in years to come.

Another item which comes to light with the document forwarded on May 23rd, 2013 on page 20 the Safety Zone around the White Rose field is not the same which was used in the consultations in the fall of 2012. Discrepancies in the Safety Zone was also a topic which caught harvesters off-guard when being consulted on the White Rose Expansion Project. It is incumbent on the proponent to use correct and accurate information when submitting to the Canada-Newfoundland & Labrador Offshore Petroleum Board (C-NLOPB). The FFAW is uncertain at this time if there was or was not made a change to the Safety Zone for the White Rose field.

Inconsistency in the materials being used to consult with other ocean users is no way forward to foster cordial relationships between industries. It would be incumbent on all proponents, including Husky Energy, to maintain as open a dialogue as permits with the industries. Openness and transparency is not apparent when at a consultation session in the fall of 2012 one thing is stated categorically and come the spring 2013 there are submission indications of the opposite.

In accordance with what has been described above, the FFAW has reservations about the manner in which the proponent has handled both the White Rose Expansion Project and the possibility of doing a well site survey on Exploration Licence 1090R. In the future it would also be conducive for the C-NLOPB to have consultations with other ocean users before announcing calls for bids on parcels of land. Whenever there are calls for bids on parcels of land that are within the Canadian Exclusive Economic Zone, there is the potential of exploration activities impacting other ocean users – what then takes precedence existing/traditional or new activity. Some of this could and would be avoided if the C-NLOPB involved other ocean users before issuing calls for bids.

It is realized that what is being proposed does fit within the scope of work described in an accepted Environmental Assessment, but the FFAW is obliged to make this concern known. These comments should not to be taken as being against the economic opportunities that are provided to the province of Newfoundland & Labrador through the exploration and development of petroleum resources. The provincial economy has for centuries been built on marine resources, there is a real danger that the expansion of a single non-renewable industry can be to the detriment to the economic opportunities of others users. Therefore, it is encouraged that the industries continue with their consultation efforts and possibly the C-NLOPB could start consulting ocean users prior to issuing calls for bids.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison