



**FISH, FOOD AND
ALLIED WORKERS**

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Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
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Dear Darren,

Thank you for providing the Husky Energy Labrador Shelf Seismic Program 2010-2017 Environmental Assessment document. 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 Fish, Food and Allied Workers' Union (FFAW/CAW).

The commercial fishery is very important to many communities on the south coast of Labrador. While the membership of the Fish, Food and Allied Workers' (FFAW/CAW) Union live in communities as far north as Fish Cove Point (just north of Cartwright), our Labrador members fish in NAFO divisions 2J, 2H and 2G for crab, shrimp, turbot, cod, etc. As well, our harvesters in 4R (northern Newfoundland) have rights to fish in 2J, and our northeast coast fishers still have fishing rights off the coast of Labrador as well. We also have members who fish quotas for the Natuashish Government in 2H.

As such, one of the industry's concerns with a multi-year seismic program being proposed is the need for frequent communication between the industry and the oil and gas company, in this case Husky Energy. Harvesters are spread out over a wide geographic area and communication is vital to the safety of all involved. There is a need for good planning and further consultation directly with the fishing industry several months prior to the start of the various components of the seismic program to avoid potential conflict(s) at sea. This should be coordinated with the FFAW and include consultations in communities such as Cartwright and Port Hope Simpson, where the majority of the harvesters fishing in the project area live.

While historical fishing patterns have been documented fishing activity can change from year to year and during the season as well. As an example, turbot is becoming more of an important commercial species and many harvesters have geared up to fish turbot in 2010. (There is limited mention of this species in terms of potential conflicts in the document). This fishery uses fixed gear which may introduce more potential interactions between the fishing and oil and gas sectors in the coming years. The fishery is also being actively prosecuted at the time that Husky Energy is proposing to conduct its program. It is therefore important that Husky Energy maintain regular communication with the FFAW to keep apprised of ongoing developments with this, and other fisheries in the project area.

The unknown long term effects of seismic activities continue to concern harvesters as well. There have been reports from harvesters that fish behavior has been affected following seismic blasts and shellfish have disappeared from areas following seismic work being undertaken. While the research has not determined any direct mortality of fish or shellfish attributable to seismic activity, as the document describes, there may be behavioural changes that could affect migration and/or reproductive and spawning activities as well as movement of the exploitable biomass in an area. The possibility that the fishery could be impacted in the future from seismic programs validates the concerns of harvesters.

Further to this, several companies have, or are in the process of indicating their interest in conducting seismic programs in the same timeframe as Husky Energy. The potential for seismic surveys to be conducted concurrently increases the risk for potential conflicts with fishing vessels and gear. This also increases the potential impact of seismic activity on important fish and shellfish resources.

With respect to accidental oil spills or other discharges, however unlikely they may occur during seismic programs, it is understood that these events will be prevented through the application of mitigative measures. It is important to note however that while the impacts of an oil spill or accidental discharge may be localized on the marine environment there could be longer term negative impacts on Newfoundland and Labrador seafood products in the global marketplace with reports of product tainting. Concern heightens further as a project proceeds to the drilling and development stages. Accidental oil spills and discharges significantly threaten the fishing industry.

In terms of timing of the seismic program identified by Husky Energy, the project area may be actively fished by harvesters. The same narrow window of opportunity for seismic work is also the same window when fishing takes place. It is also important to note that an industry post-season crab survey takes place in 2J in the fall of the year. There is also an industry crab survey conducted in 2H in the fall of the year but that is not coordinated by the FFAW.

To mitigate potential conflicts with fishing vessels and fishing gear we recommend the company consider utilizing a fishing industry guide vessel as well as a Fisheries Liaison Officer during the program. The FFAW has a guide vessel program in place to mitigate safety concerns between the fishing and oil and gas industries. A fishing guide vessel would be better suited than a chase or picket vessel as they have experience with vessel traffic and gear deployment on the fishing grounds where the seismic activities are taking place. The fishing guide vessel could also serve to provide a communication "platform" for the fishing industry during the seismic program.

I thank you for providing an opportunity for the FFAW/CAW to comment on the Husky Energy Labrador Shelf Seismic Survey Program 2010-2017 Environmental Assessment document. If you have any questions or comments please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Robyn Saunders". The signature is written in a cursive, flowing style.

Robyn Saunders
Petroleum Industry Liaison