



**FISH, FOOD AND
ALLIED WORKERS**

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DAVID DECKER
Secretary-Treasurer

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Dear Darren,

Thank you for providing the Investcan Labrador Shelf Area Seismic Survey Program 2010-2017 Environmental Assessment document for review. 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' Union (FFAW/CAW) 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 Investcan Energy Corporation. 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 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.

While historical fishing patterns have been detailed in the document 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. 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 Investcan is proposing to conduct its program due to weather and ice conditions. It is therefore important that Investcan maintain regular communication with the FFAW to keep apprised of ongoing developments in the fishing industry.

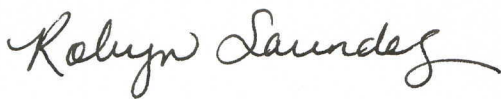
The unknown long term effects of seismic activities continue to concern harvesters as well. There have been reports from harvesters that fish behavior has been affected following seismic blasts and shellfish have disappeared from areas following seismic work being undertaken. While the research has not determined any direct mortality of fish or shellfish attributable to seismic activity it needs to be recognized that 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 Investcan. 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. In this regard, the comment in the document (P. 160) that "follow-up and monitoring are not recommended for fish and shellfish for routine seismic activities" is extremely debatable within the fishing industry, given the amount of interest by oil and gas companies to do seismic work in the area.

In terms of timing of the seismic program identified by Investcan, the project area may be actively fished by harvesters. 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 Investcan Labrador Shelf Area Seismic Survey Program 2010-2017 Environmental Assessment document. If you have any questions or comments please feel free to contact me.

Kind regards,

A handwritten signature in cursive script that reads "Robyn Saunders".

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