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FISH, FOOD AND  
ALLIED WORKERS

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DAVID DECKER  
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Tuesday, June 5, 2012

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 4th Floor  
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Dear Darren,

Thank you for providing the Multi Klient Invest Northeast Newfoundland Slope 2D Seismic Survey Programme 2012-2017 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).

A consultation was held with fish harvesters during the development of this Environmental Assessment in February 2012. Issues and concerns concerning the impacts of seismic noise on the crab and shrimp resources were discussed at that time. (The effects on crab, however, were noticed following seismic work in 2008, page 240). As documented in the EA, MKI intends to follow the recommendation of fish harvesters and avoid active crab and shrimp grounds until after the dominant harvest season (page 184-185).

It should be noted while the "productive (harvesting) months" in the EA are listed as May to September (page 153), April can also be a busy month on the water. Furthermore, the industry post-season crab season is carried out from September to November. This is important as the timing of surveys in subsequent years is unknown at this point in time (Page 184).

Fisheries resources in this document are discussed for the overall study area of the project (pages 144-168). Fish harvesters have licenses to fish in select portions of the study area. Therefore, they may or may not be affected by resource declines or quota cuts in their fishing areas from year to year. One needs to be careful in making assumptions that could indicate that fishing effort may be on the decline overall. For example, the snow crab resource in 3L has been quite healthy in the last few years and quotas have actually increased. As well, fishing effort can be influenced by price. Turbot effort, for example, is highly market dependent. Prices have been good in the last few years such that effort has increased (page 167). It is therefore important that MKI maintain regular communication with the FFAW to keep apprised of ongoing developments and activities with respect to commercial fisheries in the project area.

On the issue of submarine cables I am of the understanding that Hibernia Atlantic has plans to install a new cable across the Grand Banks in 2012-2013 (page 170-171). This project may have been delayed or aborted however.

Several companies plan to conduct seismic programs, VSP programs and geohazard surveys offshore Newfoundland this year and quite likely beyond (pages 172-178). The potential for seismic work 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. While each separate project predicts no significant impacts of seismic surveying on commercial fisheries the cumulative impacts are still of utmost concern to fish harvesters who depend on the resource for their livelihoods.

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 not result in tainting of fish or fouling of gear (page 242) there could be longer term negative impacts on Newfoundland and Labrador seafood products in the global marketplace with any perceived product tainting. Accidental oil spills and discharges significantly threaten the fishing industry.

Finally, one of the fishing industry's concerns with a multi-year seismic program is the need for frequent communication between the industry and the oil and gas company, in this case MKI. 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 each year. This should be coordinated with the FFAW. While historical fishing patterns have been documented fishing activity can change from year to year and during the season as well to mitigate conflict.

I thank you for providing an opportunity for the FFAW/CAW to comment on the MKI Northeast Newfoundland Slope 2D Seismic Survey Programme 2012-2017 Environmental Assessment document. If you have any questions or comments please feel free to contact me.

Sincerely,

Robyn Saunders Lee  
Petroleum Industry Liaison