
KEITH SULLIVAN
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Friday, October 12, 2018

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
St. John's, NL A1C 6H6

Re: Environmental Assessment of Multiklient Invest Labrador Offshore Seismic Program, 2018-2026 – July 2018

Dear Mr. Hicks,

From information presented in this EA it does not appear as the proponent has a true understanding of the current fishing industry off the Labrador coast. This is concerning if the proponent is to work with the fishing industry in the coming years to avoid potential conflicts between the two industries.

While the EA provides notes on consultations with the fishing industry it references a fleet meeting with crab harvesters in 3L. These harvesters do not fish crab in 2J where the work is being proposed. Site specific consultations in Labrador were conducted two years prior to the proposed work. It should be noted that there are harvesters from other areas of the province who can fish for shrimp and turbot in the study area. Additional consultation is recommended.

The catch data (2010-2015) presented in this document is very outdated. While it is understood that this data can be challenging to acquire there is room in the commentary for updates from industry players to ensure the information is relevant. For example, there is indeed a commercial cod fishery in 2J which uses various gear types including hand lines and gillnets. The "inshore fleet" generally comprises fishing vessels up to 65 feet in length. Generally, vessels greater than 35 feet fish for crab (not less than 35 feet as the document states). Turbot is fished using both trawls (primarily the offshore fleet of vessels greater than 100 feet) and gillnets (inshore fleet). There is no current directed fishery for grenadier or witch flounder in the Labrador offshore. These species would be incidental by-catch from one of the three main fisheries (crab, turbot and shrimp). The shrimp fishery is indeed the most valuable fishery in the region but there is more potential conflict with fixed gear crab pots and turbot gillnets from an operational side. (It is recommended that the Shrimp Fishing Areas be mapped along with NAFO divisions when portraying shrimp catch data).

The collaborative DFO-industry post season crab survey has undergone changes in terms of the location and number of survey stations in recent years. The survey

footprint has been increased with stations shifting from densely sampled regions to cover a broader Snow Crab habitat range. Fixed stations will remain the same for five years while random stations will change every year. A review of the data will be conducted every year by DFO, FFAW/Unifor and fish harvesters. The changes to the post-season crab survey are not accurately reflected in the document.

FFAW/Unifor continues to raise objection to the presented "7 day/30 km temporal/spatial avoidance protocol" mitigation measure presented for the post-season crab survey. It continues to be FFAW/Unifor's position that seismic work should **NOT** be conducted in the vicinity of survey stations until they have been sampled for the year. This post-season crab survey continues to be vital to the fishing industry as it informs decision making with regards to quotas for coming years. Our members rely on this survey to be completed each year, without interruption or potential effects from outside variables. It is understood that seismic planning around the survey stations is challenging.

The area being proposed is large in scope. It is difficult to comment on the impacts to the fishing industry without knowing more spatial and temporal specific plans of proposed survey programs. It is imperative that there is a effective flow of information between the fishing and seismic industries several months prior to the start of the seismic season such that early engagement can occur and plans can be adapted, if necessary.

It is critical that effective and regular communication ensue with the fishing industry throughout the EA lifespan so that the seismic company is kept apprised of ongoing developments within our dynamic fishing industry.

FFAW/Unifor is prepared to work cooperatively with MKI regarding the planning of seismic acquisition to avoid interactions of seismic project activity and science survey work.

If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
