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**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

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Monday, April 23, 2018

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

**Re: Nexen Energy ULC Eastern Newfoundland Offshore Geophysical,  
Geochemical, Environmental and Geotechnical Program (2018-2027)  
Environmental Assessment Addendum**

Dear Mr. Hicks,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/Unifor) with the opportunity to comment on the Environmental Assessment Addendum of Nexen Energy's Eastern Newfoundland Geophysical, Geochemical, Environmental and Geotechnical Program (2018-2027).

While the proponent addressed a communication concern regarding the role of the Fisheries Liaison Officer (FLO) on page 7 of the addendum, they suggested "the use of a standby or guard vessel to scout for hazards and for communicating with active fishers in the area" as a planned mitigation measure on page 34. *The FLO is best placed on the seismic survey vessel as the **primary** at-sea liaison between the commercial fishing industry and the seismic survey program.*

We strongly **disagree** with the proponent's assessment that "the presence of seismic sound energy...is (not) likely to have a detectable (economic) effect upon the fishing industry in the Study Area" (page 35). There have been numerous reports from fish harvesters to the contrary.

It has been documented in the peer reviewed literature that seismic survey activity may result in behavioural changes among fish species. While these changes have been reported to be temporary, avoidance, startle responses and changes in swimming speed and direction can all have an impact on commercial fishing activities taking place at finite times (i.e. seasons) in finite spaces (i.e. fishing areas). The fishing industry has already witnessed catch rates drop

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immediately after a seismic vessel has entered an area where fishing is taking place, directly impacting economic return.

We therefore take exception to the proponent's **definitive** statement that it is unlikely behavioural effects would result in any "detectable reduction in the overall economic returns generated from fisheries...over one or more years" (pages 4 and 35).

The fishing industry continues to advocate for more research on impacts of seismic activity on important commercial species including shrimp, crab, turbot and Atlantic cod. These studies need to include commercial catchability in order to substantiate concerns from harvesters in Newfoundland and Labrador.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison