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Friday, September 14, 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: Nexen Energy ULC Eastern Newfoundland Offshore Geophysical,
Geochemical, Environmental and Geotechnical Program (2018-2027)
Environmental Assessment Addendum (Revised)**

Dear Mr. Hicks,

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

We maintain our position that seismic activity impacts catch rates and has a resultant/detectable effect upon the economics of the fishing industry. Any change in fishing pattern/activity **is** a realized economic impact to harvesters. Research in this area has been extremely challenging to initiate. Whether this specific project will impact the industry will be highly dependent on commercial fishing activities taking place at finite times (i.e. seasons) in finite spaces (i.e. fishing areas) and the specific areas of interest to Nexen Energy in any given year (2018-2027).

For this reason it is critical that Nexen commit to planning with the fishing industry several months prior to the start of any seismic work in any given year of planned activities in NL waters. Our experience with new proponents to NL waters is that this "planning ahead" step is skipped and there is a heavy reliance on the FLO for planning, as this document suggests. The FLO will not be engaged in the process until the exploration activity begins on the water, that is, through actual marine activity. This is too late to change work plans.

As a minor point, although it was noted in other sections of the document, the FLO should be the primary individual to communicate with active fish harvesters, not the standby or guard vessel (Page 6, fourth point).

We look forward to further direct communication with the proponent as this EA approval/authorization process evolves. We have not heard from the company since March 2017, an initial meeting, which is concerning.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
