

**Ms. Kim Coady
Environmental Assessment Officer
Canada-Newfoundland Offshore Petroleum Board
Fifth Floor, TD Place
140 Water Street
St. John's, NL
A1C 6H6**

May 2, 2007

**Re: Environmental Assessment of Petro-Canada's
Jeanne d'Arc Basin 3-D Seismic Program**

Dear Mrs. Coady,

Thank you for the opportunity to comment on the Environmental Assessment of Petro-Canada's Jeanne d'Arc Basin 3-D Seismic Program. The Fish, Food and Allied Workers represent the fish harvesters of Newfoundland and Labrador. Open communication and information sharing is the effective approach to promote coexistence of two diverse industries (Fishery and Petroleum) in the same ocean. Please view the following comments on the Petro-Canada Environmental Assessment for their Jeanne d'Arc Basin 3-D Seismic Program.

The timing of this seismic program is certainly not the optimum period for this type of activity, from the fishing industry's perspective. Spring and summer months are the best time of year for various species to be harvested. Due to quotas, weather and variances of species, the heaviest activity of the fishery occurs in the spring and summer. During these months, there will be an abundance of fishing vessels on the water, mainly fishing crab and shrimp. May and June are the months of the heaviest harvesting. August is considerably lighter in fishing activity around the study area, due to the completion of the crab fishery at the end of July. To avoid interaction with

fish, fishing vessels and gear, August to October would be the ideal time to carry out a seismic program.

This overlap of two industries will present some challenges and issues for the *program*. However, through effective planning, communication and cooperation, both industries should be able to perform their normal duties. This will be only possible because of a new position onboard seismic vessels-Fisheries Liaison Officers (FLO). Understandingly, there is a challenge to secure seismic vessels and weather restrictions play a large role in the timing of seismic programs.

Fisheries Liaison Officers will be the key player in avoidance of fishing gear damage. Through their experience and knowledge of the fishery, monitoring, reporting and communication with vessels, FLO's will certainly minimize the risk conflicts with fishing vessels and their gear. Occasionally, there have been incidents of damage and loss of fishing gear, and compensation measures have been agreed upon. These compensation measures must be outlined to harvesters and more "timely" settlements will be necessary. Compensation must cover *all* financial losses, as a result of gear loss. This process has been effective in the past, but requires much quicker compensation for loss of gear.

The Document shows that seismic programs should be scheduled to reduce impacts or interference of DFO surveys. These scientific surveys are paramount to the fishery: past, present and future. The commercial fishery should be given equal consideration in scheduling of these programs.

- The Western Patriot is identified as the seismic vessel for the *program*. The document shows that it will be this vessel, "or no other vessel." Has this vessel been secured for this year (2007)? If so, what are the expected times of arrival to Newfoundland and Labrador? Also, it appears that this vessel could possibly be going on dry-dock. If this happens, what are the timelines, and in turn, when would the *program* actually commence?
- Picket Vessels are briefly mentioned, to aid in the overall quality and effectiveness of the *program*. However, there are no details on these vessels in the document. Are these local vessels? Fishing vessels? What are the requirements: size, crew, etc.? Who is responsible for identifying these picket vessels?

- The timing of the program overlaps with fishing activity, but also overlaps some species' spawning periods. With so many questions about the effects of seismic surveys on fish, in various stages of life, spawning periods could potentially create greater risk to marine species. Cod, crab and flounder are all species that spawn in the timeframe of this *program*.
- The value of crab landings are discussed in the document, as expected to be higher this season. Actually, the price of crab has substantially increased for this season.
- Consultations have been conducted with stakeholders. The most effective ways to inform fishers are through the media: Fisherman's Broadcast, Newspapers, Notice to Mariners and Union Forum. A notification of the *program* in the Union Forum was suggested, but this was never executed.
- The Transit Route from St. John's to the Study Site will be a critical component of the *program*. Because the streamers will be deployed during this transit, the possibility of interaction with vessels and gear will be increased for this stage of the *program*. Due to the extremely busy time in the fishing season, there will be immense amounts of fishing activity during this time. This route will take strategic planning and continued consultation with One Ocean and FFAW.
- Figure 4.36 should focus on timeframe that is expected for Seismic Vessel to be in transit.
- FFAW will provide exact locations of the Snow Crab Survey in the coming days, as they are almost finalized. These sites are selected as locations of interest for scientific information on crab. Please note, the document states that the crab survey only lasts 24-48 hours. That is actually the time is generally takes for each vessel to perform the survey. However, all vessels involved are not simultaneously conducting the survey.
- Section 5.6.5.2 discusses the potential for leakage from streamers. What procedures, plans and equipment are in place for this type of

incident? What is the history or probability of these streamers breaking? Is evaporation the best available measure of clean up?

Thank you in advance for addressing these comments. If you have any further questions, I can be reached to the co-ordinates below.

Regards,

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