



Tuesday, March 31, 2020

Regional Assessment Committee
Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador
c/o John Cabot Building, 10 Barter's Hill, Suite 301
St. John's, NL A1C 6M1

Re: FFAW-Unifor Comments regarding the GIS Decision Support Tool for the Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland

Dear Committee Members,

Please accept Fish, Food and Allied Workers' Union (FFAW-Unifor) comments regarding the GIS Decision Support Tool as part of the Regional Assessment for Offshore Exploratory Drilling East of Newfoundland.

FFAW-Unifor members are concerned about how additional exploration drilling in our offshore will further affect the traditional fishing grounds of harvesters. As we have commented on previous strategic and project-specific environmental assessment documents, the potential for projects to interact with and directly affect the fishing industry will be highly dependent on the nature, location, timing, activities and the equipment and/ or gear involved. While it is easy for oil and gas companies to isolate their activities into specific projects, it is challenging for the fishing industry to do this with the knowledge that there are many exploratory and developmental activities being planned in the next decade as the oil and gas industry continues to expand in the Newfoundland and Labrador offshore.

From a fishing industry perspective, the GIS Decision Support Tool is a step forward with the ability to **overlay** fisheries data over proposed exploratory drilling areas (licences). This is rarely documented in project-specific assessments and has not been done in Strategic Environmental Assessments. From our experience it is only once one appreciates the level of fishing activity within a prospective area that a proponent begins to effectively engage with the fishing industry.

There are a number of caveats that need to be understood with respect to the fisheries data available on the current GIS platform. First, the data is dated and in some cases not available (redacted) due to rules around privacy. (It is recognized and understood by FFAW-Unifor that this is the best information available and we appreciate your recognition/understanding of this as well). Second, when looking at catch data by species there is often much confusion about targeted fisheries and bycatch species. Third, the value of the fishery changes from year to year based on quotas, market price fluctuations, and at times due to weather and/or ice. The fishery is highly dynamic and fisheries quotas change from year to year based on science, analysis of catch and other assessment tools. Therefore, any conclusions based on fisheries data available within the GIS Decision Support Tool should be discussed and referenced by knowledgeable individuals within the fishing industry. To this point, *FFAW-Unifor is very concerned that use of the GIS Decision Support Tool will diminish the need for oil and gas companies to discuss planned activities with the fishing industry directly.* **A recommendation or procedure needs to be put into place to prevent this from happening.**

Overall, if the GIS Decision Support Tool is to remain useful going forward data will need to be updated frequently within the platform. The **need for a Regional Assessment Oversight Committee**, as recommended by your Committee, is critical to keep this process “evergreen”. It is our view that the Oversight Committee should be tasked to review the Tool on an annual basis and identify and incorporate new or updated information, as needed. There also needs to be continued public scrutiny of the data available and therefore a process through which comments can be considered (i.e, annual review period). The offshore environment is continually evolving. As such, the updating of data needs to follow suit.

Your Committee also recommended that government agencies accelerate their relevant science/policy processes regarding “special” areas of concern to determine if environmental protection measures are required. Many of these areas have been closed to fishing for a long time, at a time when oil and gas activity was not anticipated. It is important that there be some transparency regarding environmental protection for **all** ocean users. **This information should then be incorporated into the RA/Support Tool.**

When discussing impacts related to exploratory drilling (and production), it is important to consider not only the footprint of the drilling, but the associated activities (e.g., the setup and moving of the rig, associated vessels, etc.) that could also interact with fishing activity. It would be useful from a cumulative effects perspective to incorporate fisheries data outside of the regional assessment area to also depict the amount of fishing activity closer to shore, that is, along transit

routes. This is done for many of the data sets already. Extending the data sets may also prove useful if future regions are assessed and a single data platform is used.

We'd again like to thank the Committee for your hard work with the first Regional Assessment and for envisioning this novel GIS support tool to support the process. We look forward to future engagement with the Impact Assessment Agency on its use in applicable regulatory and planning processes.

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

Kind regards,

<Original signed by>

Keith Sullivan
President