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KEITH SULLIVAN
President

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Friday, December 11, 2020

Impact Assessment Agency of Canada
Follow-up Unit
160 Elgin Street
Ottawa, ON K1A 0H3

Re: FFAW-Unifor Comments regarding Follow-up Program draft Terms of Reference document for the Regional Assessment of Offshore Exploratory Drilling East of Newfoundland and Labrador

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments regarding the draft Terms of Reference document for the RA Follow-up Program to be undertaken by the Government of Canada.

While the document outlines the general premise of the RA Follow-up Program, it is difficult to provide comment at this stage on specifics. A more tangible work plan that describes how the various government agencies and departments propose to fulfill the commitments of the Government of Canada (in the Ministerial Response) would be beneficial in this instance. It is understood that this is still being worked out between the parties.

We are hopeful that the GIS Support Tool, developed in conjunction with the Regional Assessment process, will be helpful in clearly identifying resource conflict areas between the petroleum and fishing industries going forward. It is critical however that the data is updated on a regular basis, twice a year if necessary, to be useful in generating maps that display areas of contention in the large ocean area that comprises the Offshore Eastern Region.

As a key ocean stakeholder FFAW-Unifor members would appreciate further detail on engagement opportunities for the fishing industry within this program. We would strongly recommend that more personal engagement be involved, rather than simply the review of documentation. Understandably at this time, meetings can take place virtually over phones/computers rather than in person.

Without knowing the make-up of the RA Follow-up Advisory Committee it is unknown at this point what additional considerations will be factored into the work of the Steering Committee. Therefore, engagement with fishing interests outside of the Committee would be appropriate and necessary.

One final recommendation would be to review the Terms of Reference on an annual basis to ensure that it is relevant to the work being conducted and objectives are being met.

We look forward to following the progression of this program. The timelines are tight to provide a progress report in March 2021 but that report will provide more substantive information to fully understand the direction of this program.

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

Kind regards,

<Original signed by>

Keith Sullivan
President
