



FISH, FOOD AND
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Darren Hicks
Environmental Analyst
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Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the opportunity to comment on the Environmental Assessment of Statoil's Geophysical Program for the Jeanne d'Arc and Central Ridge/Flemish Pass Basins, 2011-2019. I'd like to comment on a few aspects of the study that are representative of issues and concerns from the fishing industry, namely the members of the FFAW/CAW.

To clarify a point made in the document (page 199, C-6, C-7, C-8), fishing gear may only be retrieved from the water by the gear owner (i.e. fishing license holder). This includes buoys, radar reflectors, rope, nets, pots, etc. associated with fishing gear and/or activity. If gear contact is made during seismic operations it should not be retrieved or retained by the seismic vessel. There are conditions that may warrant gear being retrieved or retained if it becomes entangled with seismic gear however so further clarification on rules and regulations regarding fishing gear should be directed to the Conservation and Protection Division of Fisheries and Oceans Canada (NL Region).

Also, to clarify, it is unreasonable for Statoil to encourage or ask a fish harvester to shift or set his gear away from the project area (page C-1) such that the seismic ship can pass through without incident. Setting gear in an area outside normal fishing grounds may result in loss of catch, increased expenses and therefore decreased revenue for the harvester. Exploration activities should not be conducted at the expense of the harvester.

Another point in the document requires clarification. The Newfoundland and Labrador population of Atlantic cod is not currently designated as endangered under COSEWIC (page 43). It may be recommended for this designation but the Government of Canada has not made a decision on this.

Finally, the quota in 2010 for the 3M cod fishery was 44 tonnes. The quota in 2011 was increased to 10,000 tonnes (page 109). In 2011 Canada acquired a greater percentage of the quota (0.8% in 2010, 3.3% in 2011). The company should be aware that there may be international fishing vessels operating in the 3M area that may or may not be familiar with communication practices that have been established for oil and gas exploration activities in Newfoundland and Labrador waters.

It is important that Statoil maintain regular communication with the FFAW to keep apprised of ongoing developments with fisheries in the large project area. A number of surveys and programs are proposed over the nine years. Harvesters are spread out over a wide geographic area and communication is vital to the safety of all involved.

The unknown long term effects of seismic activities continue to concern harvesters. There have been reports from harvesters that fish behavior has been affected following seismic blasts and shellfish have disappeared from areas following seismic work being undertaken. There have also been reports from vessel captains that ground fish catches have been impacted when oil and gas activities have been ongoing. While the research has not determined any direct mortality of fish or shellfish attributable to seismic activity there may be behavioural changes that could affect migration and/or reproductive and spawning activities as well as movement of the exploitable biomass in an area. This, in turn, can impact catch rates in years to come. There is need for further research on impacts of seismic activity on important commercial species including shrimp, crab, turbot and Atlantic cod to address data gaps.

The commercial fishery will be actively prosecuted at the time that Statoil is proposing to conduct its program in 2011 and beyond. While historical fishing patterns have been detailed in the document, fishing activity can change from year to year and during the season as well. While there has not been recent fishing activity recorded in the area of the 2011 proposed program other areas of the project area are heavily fished by the inshore fleet. The offshore fleet and other international vessels may also be fishing in the area.

In addition to the deployment of a Fisheries Liaison Officer onboard the seismic vessel, to mitigate potential conflicts with fishing vessels and fishing gear (both towed and fixed gear) in heavily fished areas of the project area, we recommend the company also consider the deployment of a Fisheries Guide Vessel when they work in this heavily fished area. The loss of fishing time, catch and/or gear that may be associated with gear entanglement in this area may be significant during this prime period so all avenues to mitigate conflicts should be considered. The deployment of a Fisheries Guide Vessel may also be beneficial during the route analysis and/or transit of the seismic ship from St. John's to the Flemish Pass in 2011.

I thank you for providing an opportunity for the FFAW/CAW to comment on Statoil's Geophysical Program for the Jeanne d'Arc and Central Ridge/Flemish Pass Basins, 2011-2019 Environmental Assessment document. If you have any questions or comments please feel free to contact me.

Kind regards,



Robyn Saunders Lee
Petroleum Industry Liaison