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FISH, FOOD AND  
ALLIED WORKERS

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DAVID DECKER  
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Tuesday, May 29, 2012

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 4th Floor  
St. John's, NL A1C 6H6

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 WesternGeco's Seismic Program for the Jeanne d'Arc Basin, 2012-2015. 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.

A consultation was held with fish harvesters during the development of this Environmental Assessment in February 2012. Issues and concerns addressed at that time concerning the impacts of seismic noise on the crab and shrimp resources are clearly documented in the EA. WesternGeco's 2012 area of interest for seismic survey does overlap with important crab fishing grounds. Recommendations were provided to the company to survey the eastern portion of the area last (preferably after the close of the snow crab fishery in 3L) and/or to maintain a 20 kilometre buffer from harvesting activities. Further communication regarding the deployment of streamers prior to the start of the 2012 survey is still warranted to mitigate conflict/fixed gear interactions.

Further to this, several companies plan to conduct seismic programs, VSP programs and geohazard surveys in the same general area as WesternGeco this year and quite likely beyond. The potential for seismic work to be conducted concurrently increases the risk for potential conflicts with fishing vessels and gear. This also increases the potential impact of seismic activity on important fish and shellfish resources.

While the overall catch of various species from the entire project area is described as small or negligible in the document (page 61, 64, 72) it is important to note that the area provides significant economic return for many fishing enterprises that are restricted to fishing in those particular areas due to license conditions and where the species can actually be harvested. Fishing activity can change from year to year and during the season as well. It is very important that WesternGeco maintain regular communication with the FFAW to keep apprised of ongoing developments with fisheries in the project area throughout the duration of this Environmental Assessment (2012-2015).

I thank you for providing an opportunity for the FFAW/CAW to comment on this EA. If you have any questions or comments please feel free to contact me.

Kind regards,

Robyn Saunders Lee  
Petroleum Industry Liaison