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Wednesday, July 08, 2015

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> Floor, TD Place  
St. John's

Mr. Hicks,

**Re: WesternGeco Eastern Newfoundland Offshore Seismic Program, 2015-2024  
Environmental Assessment**

Thank you for providing the Fish, Food and Allied Workers (FFAW|UNIFOR) with the opportunity to comment on the Environmental Assessment for WesternGeco Eastern Newfoundland Offshore Seismic Program, 2015-2024.

FFAW-Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador (NL). At our initial consultation meeting with WesternGeco in January 2015 we advised the company that fish harvesters are interested in being more engaged and directly involved in the consultation process for project-specific Environmental Assessments. This EA covers a large project area that could affect several fishing fleets in different areas over a long time period. Therefore we suggested several locations for meetings to provide access for the harvesters to attend. Concerns related to seismic impacts on commercial harvesting have been documented. However, providing information about project specifics directly to those actively fishing in an area would seem a reasonable mitigation measure to create awareness and prevent conflict on the water. However, the company did not seem to think additional meetings were necessary. They cited short time frames and tight timelines and the necessity to meet with harvesters in person at various locations as not being warranted as they planned to focus only on the Flemish Pass area in 2015.

Additionally, there are a few specific items in the document that FFAW-Unifor would like to comment on:

- Page 51 – COSEWIC reference stating no recovery of either abundance or age structure of offshore cod has been observed since the moratoria is contradictory to the most recent DFO stock status update for 2J3KL cod.
- Page 153 – Advice received during consultations on additional meetings with harvesters prior to the project beginning was not taken.

- Page 159 – The spatial-temporal avoidance protocol referenced for the post-season crab survey report is not acceptable to FFAW-Unifor. Seismic work should not be conducted in the vicinity of fixed stations of the post-season crab survey until they have been completed.
- Page A1-3 – Again, FFAW-Unifor does not believe that there were adequate consultations to inform fish harvesters about this lengthy and expansive program prior to its expected commencement.

Overall the document is very non-specific in terms of the actual project that is planned over a ten-year period. As such it is challenging to comment on how the work will impact commercial fishing and/or the environment in this ten-year period.

It remains of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program may have vessels operating within active harvesting areas throughout the ten year period. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Thank you for the opportunity to provide input on this environmental assessment.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

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