



PO Box 10, Station C
368 Hamilton Avenue, 2nd Floor
St. John's NL A1C 5H5

FFAW | UNIFOR
Fish, Food & Allied Workers

Tel: 709.576.7276
Fax: 709.576.1962
Web: www.ffaw.nf.ca

KEITH SULLIVAN
President

DAVID DECKER
Secretary-Treasurer

Tuesday, July 07, 2015

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

Mr. Hicks,

Re: WesternGeco Southeastern 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 Southeastern 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 45 - Snow crab is actively fished in the Carson Canyon so it is in abundance in this area although grab samples used in this reference would not necessarily be able to sample/identify crab.
- Page 49 – While the recent oceanic warming regime is predicted to result in declining shellfish stocks we have not seen the inferred decline in the crab resource in 3LNO.
- Page 52 – no mention of the NAFO closure in 2015

- Page 56 – 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 166-167 – As mentioned it is FFAW-Unifor's opinion that consultations with fish harvesters should have been more extensive for this 10 year EA covering such an expansive area.
- Page 176 – Advice received during consultations on additional meetings with harvesters prior to the project beginning was not taken.
- Page 181 – 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 216 – There may be gill nets set for groundfish in this area as well.
- 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
