
FISH, FOOD AND
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Elizabeth Young
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
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Ms. Young,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following replies to the responses provided by Husky Energy on the comments provided by the FFAW on the **White Rose Extension Project** (WREP) Environmental Assessment. The FFAW continues to be generally supportive of the proposed project, but we have to balance that support with our responsibility to protect the interests of our fish harvesters and plant worker membership and the health of our marine environment for future generations.

The FFAW has looked through the responses provided by Husky Energy on the comments. From this we have the following replies on said responses.

- Comment #1: The Fisheries Liaison Committee should not have to wait on the commencement of marine construction activities. Seeing that all activity will have some impact/involvement from/to the marine environment. Constituting the Fisheries Liaison Committee at the earliest convenience would largely be a beneficial venture, rather than holding off until activity happens. Early constitution will be conducive to enhance the positive approach to the mitigation efforts relating to the WREP. Looking at the response, the FFAW feels that there needs to be a definition of what prior to the start of marine construction activity is warranted.
- Comment #3: The FFAW feels that using only the interior of Placentia Bay excludes the headland communities. The WREP would have been better served using the whole of 3Psc as study area. This relates back to the fact that mitigation needs to include consideration of whole bay as a complex ecosystem and socio-economic environment. Activity in a single area can/will have economic and social implications for whole of bay.
- Comment #4: The response provided by Husky Energy does not suffice in the context of the comment. As relating to Comment #6, 20 years is an inadequate timeframe in view of the FFAW. Historical data should/must include considerations of patterns pre-moratorium.
- Comment #6: The response aptly manages to quote and specify exactly what the FFAW comment identified as insufficient. The FFAW indicated that the data should go back past 1990,

for a proper perspective of the potential harvesting patterns – particularly in the offshore.

- Comment #7: It is clear that the reviewer is aware of what the sections contain. Therefore, merely re-citing the section number as it is in the comment is the same as not providing an answer or response to the comment!
- Comment #8: In the responses prepared by Husky Energy, Comment #8 was collapsed in with Comment #7.
- Comment #9: It is prudent to recognize that any displacement of harvesting effort will have a broader impact than only the immediate area. Husky should not wait to engage harvesters – why not engage harvesters fully before the decision on the deep-water mating site. The mitigation efforts should not be confined to having consultations inside the project area, as stated elsewhere Placentia Bay is a whole. Further it is suggested in the Mitigations section that the Fisheries Compensation Program would already have been discussed at the Fisheries Liaison Committee – a committee not yet constituted (to the best of my knowledge).
- Comment #11: There is no question that the WREP will have to be competitive to attract the workforce. “90 percent of the nickel processing plant’s construction workforce live outside the Argentia area and commute to the WREP (Sic) site on a daily basis.” It remains doubtful that the construction crew at Long Harbour travels to Argentia daily; this is what was meant to be pointed out from the quoted text.
- Comment #13: The foundation of this comment is that Husky Energy used a map reflecting a Safety Zone which had not been submitted to Transport Canada at the time of the consultation with harvesters.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison