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Elizabeth Young
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Canada-Newfoundland and Labrador Offshore Petroleum Board
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Ms. Young,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with Husky Energy's (together with its partners) White Rose Extension Project Environmental Assessment. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland & Labrador. Thank you for providing the **White Rose Extension Project** Environmental Assessment and associated documents for review. While the FFAW is generally supportive of the proposed project we have to balance that support with our responsibility to protect the interests of our fish harvester and plant worker membership and the health of our ocean for future generations.

Fundamentally, the overall project will impact fish harvesters both in Placentia Bay and the offshore. The near-shore component of the project will result in some loss of fishing grounds to harvesters in Placentia Bay. It needs to be noted that accessing alternate fishing grounds can be problematic when considering the traditional nature of the fishery in Newfoundland & Labrador. Fishing alternate grounds generally means that they are infringing on another harvester's "territory". As well, commercial species are not distributed equally in bays and coves. Therefore, the impacts of project-related activities in the next few years will have an impact on many harvesters in Placentia Bay, that is, not just those in the communities adjacent to the construction activities. All Placentia Bay harvesters will be subjected to increased risk of gear/vessel loss and damage, accidental spills, as well as reduced safety on the water, access to fishing grounds, and catch rates as a result of this project. As well, similar impacts will be faced by offshore harvesters with quotas to fish in NAFO Division 3L as offshore development begins.

Additionally, I would like to bring to your attention to a few specific aspects of the Environmental Assessment.

1. Establishing a Fisheries Liaison Committee with adequate fish harvester representation will be key in the coming months to enable appropriate consultation with the affected harvesters as the project proceeds (Section 6.2.1.3 and 9.5.1.2). Involving harvesters in the development of a near-shore Environmental Effects Monitoring program prior to the start of construction at the site will also provide opportunity for collaboration (Section 15.2.1). The FFAW and the

harvesters whom it represents are looking forward to future consultations regarding the deep-water mating location as committed to by the Partners (Section 2.7.5)


2. In the discussion on planning for the development of the White Rose Expansion Project involving the western expansion in Section 2.4 there the acronym for the Wellhead Platform (WHP) is used on page 2-14, yet in Figure 2-1 said acronym is not involved in the depiction.
3. Possible construction of the proposed Wellhead Platform structure in Placentia Bay will have an impact on the environment in the bay and more specifically fish habitat. Concerns from fish harvesters have been noted in the report with respect to dredging, debris, discharges, dumping, accidental spills, construction related noise and lighting. It needs to be reiterated however that construction activity will also impact catchability, and therefore profitability, for fish harvesters.
4. The future fisheries were nominally encountered in this Environmental Assessment. With significant environmental changes it is anticipated that there will be a change in the biomass composition in Newfoundland & Labrador waters. With the environment readjusting to more stable/normal state there is an expectation of an increased presence of finfish (such as Cod). Therefore, although Figure 9-23 shows a drastic decrease around 1990 and since stability, there are indicators that this is about to change again. The likelihood is that harvesting patterns will change and there will be a significantly increased level of fishing activity throughout the Grand Banks. Potentially that activity could rival the time prior to the cod moratorium. The White Rose Partners should consult with the fishing industry on a regular basis to keep up to date with the fishing trends for the various species.
5. Also with respect to future fisheries, information presented at RAP meetings in 2009 and 2010 indicated that there are increasing signs of cod in the offshore with scope for more recovery, with indication of a low natural mortality. The 2011 Assessment of Northern (2J3KL) Cod (Science Advisory Report) noted that the annual DFO trawl surveys indicated an eight-fold increase in the spawning stock biomass from 2004 to 2008. A commercial fishery for Atlantic cod on the Flemish Cap (an adjacent, NAFO-regulated stock) opened in 2010. For Southern Grand Banks cod (3NO) it is expected that the spawning stock biomass will surpass the conservation limit reference point set by DFO in 1999 at 60,000t. The resumption of offshore groundfish fisheries would significantly alter fishing patterns and activities within the Jean d'Arc Basin of the Grand Banks and have an impact on fishing enterprises. Again, the fishing industry should be regularly consulted to keep apprised of fishing trends.
6. The FFAW feels that the fisheries statistics contained in the Environmental Assessment are insufficient in that they do not give any reflection of the historical harvest for groundfish on the Grand Banks. With the changing environment it would be pertinent for the Environmental Assessment to contain indicators of where and how groundfish harvest was pursued on the Grand Banks, especially the formerly important codfish. Effectively, a five year horizon for past fisheries is not sufficient and does not provide a good enough perspective of the activities for the members of the FFAW.
7. Looking at the various discussion on habitat through out the Environmental Assessment there are some mishaps, such as a subheading in Section 8.5.2.1 being *Change of Habitat Quality*, the lead sentence then reads. "Habitat quantity may be reduced as a result of lighting, discharges, sedimentation and increased noise occurring due to the above activities." There obviously is a disconnect between what is written and what was intended written.

8. It is further worth to note that the final paragraph of Section 8.5.1.3 suggests that in a worst case scenario of an accidental event the impact would be such to only affect abundance or distribution of one generation of fish, and to be re-established to previous levels within several generations. This is a significant statement as with the state of the Newfoundland & Labrador fisheries any impact on the biomass or resource availability is *significant*.
9. The establishment of a Safety Zone (Section 9.5.1.1 and 9.5.1.2) at the locations in Placentia Bay will result in a loss of fishing grounds to harvesters in Placentia Bay. This is significant for inshore harvesters in Placentia Bay as previously discussed.
10. The Husky Energy Extension Project Environmental Assessment presents an untenable spin on an unfortunate situation in the Gulf of Mexico, making light of an environmental disaster (Section 9.5.3). There are now cases of species in the Gulf of Mexico that are experiencing changes in gender composition, directly affecting the species recruitment. The FFAW does not appreciate a suggestion of a potential better economic return per volume harvested, due to diminished resource availability on the market as a result of an environmental disaster. Section 9.5.3 leads with the indication that the "...effects from a spill or blowout will be not significant. However, economic impacts might still occur if a spill prevented or impeded a harvester's ability to access fishing grounds, caused damage to fishing gear or resulted in a negative effect on the marketability of fish products."
11. With regards to socio-economic considerations there is a mention that "90 percent of the nickel processing plant's construction workforce live outside of the Argentia area and commute to the WREP site on a daily basis, and a similar situation is expected with the WREP." It is unfortunate that this was not caught before the document was sent out for review. In addition who is to say that the WREP will have access to the potential labour supply surplus resulting from the completion of the nickel processing plant, there are two other major industrial projects taking place in the province at the same time that the Wellhead Platform is expected to be constructed.
12. In the consultation session with the Offshore Harvesters, one fisherman raised an issue with regards to the possibility of the petroleum activity within the White Rose Field expanding to the Northeast. If this were to take place it would have a direct impact on some of the most fruitful snow crab harvesting grounds. This was brought up as the diagrams showing the White Rose field with new drilling centres had one listed to the Northeast of the current North Drill Centre (Figure 2-15 and/or Figure 2-16). At a subsequent meeting on October 9th, 2012 between the Husky Energy and the FFAW (One Ocean was also present) Husky was indicating that any expansion towards the Northeast was not within the horizon, and there are currently no plans to pursue anything in this area. Nevertheless, when the Environmental Assessment was sent out for review this is still listed in the figures listed above. Further to this, it is mentioned that offshore harvesters were concerned that the extension into the west of the White Rose field would go into snow crab grounds (Section 6.2.2.2). This is factually inaccurate, the concern raised by the harvesters was about extending to the north, there is very limited harvest taking place to the west of the White Rose field as evident from the (limited) information presented in Figure 9-28.

13. With regards to the concerns that were raised in the context of the SWRX (Page 6-10), the issue at hand was that the Safety Zone depicted in the consultation slide differed from that which is in place out in the field. The map which was used included a zonal change, which Husky subsequently went on to apply to get implemented. At the September 20th, 2012 consultation meeting the submission to change the Safety Zone had not been made. However, at the follow-up meeting on October 9th, 2012 Husky indicated that the application for changing the Safety Zone had been submitted. The issue was not that the FFAW and One Ocean were not consulted on the SWRX, but rather that said consultation had not had any mention of a change to the White Rose Safety Zone. This approach was not conducive to the enhancement of mutual trust between the two industries. The FFAW does realize that at the time of submitting the original Environmental Assessment for the subsea drill centres Husky did not know the exact location where they would be drilling. But when the proponent knows where the drill centres will be, there needs to be further consultation if there is going to be an impact on the fishing vessels that use the area.
14. The FFAW and its members are very concerned about the potential of aquatic invasive species, such as green crab, infesting our bays and coastal waters. The additional vessel traffic associated with the construction of the Wellhead Platform in Placentia Bay may potentially lead to the introduction or proliferation of unwanted aquatic invasive species. The green crab that has become resident in areas of Placentia Bay for example has destroyed eel grass beds and competes with native crab and lobster species for food. The potential for the introduction of aquatic invasive species in the area was merely mentioned in passing (Section 12.4.2.3) in the White Rose Extension Project Environmental Assessment document. The FFAW strongly encourages the Partners to consider and detail the mitigation strategies that the contracting marine vessel companies will need to follow to prevent the introduction and/or proliferation of aquatic invasive species in Placentia Bay. Furthermore, the FFAW calls upon the various regulatory bodies to be very stringent regarding any ballast water exchange plans proposed by the Partners and ensure vessels follow proper ballast water management practices. As well, aquatic invasive species should be incorporated into the near-shore Environmental Effects Monitoring program.

The FFAW and all the affected fish harvesters are eager to work collaboratively with the White Rose Partners to ensure that the near-shore and offshore components of the overall White Rose Extension Project are successful and that everyone shares in the prosperity it hopes to create. I thank you for providing an opportunity for the FFAW to comment on the White Rose Extension Environmental Assessment. If you have any questions or comments please feel free to contact me.

Yours truly,



Johan Joensen
Petroleum Industry Liaison