

December 14, 2012

Honorable Peter Kent
Minister of Environment
House of Commons
Ottawa, Ontario
K1A 0A6

Subject: Strategic Environmental Assessment linked to Oil development in the Gulf

Mr. Minister,

Representatives of the Lower North Shore Fishermen's Association and the Multi-species Fishermen Association (Old fort – Blanc-Sablon) have met with representatives of the Canada-Newfoundland and Labrador Offshore Petroleum Board and representatives from the firm Amec Environment & Infrastructure in October 2012 at Lourdes de Blanc-Sablon. Our understanding about the consultations framework is rather considered by us as information gathering sessions for the update of a Strategic Environmental Assessment. The process was simply focused on acquiring info on the ecosystem in the concern sectors within the Northern Gulf.

We raised our concerns on the potential impact on the migration of many species of fish, pelagics (capelin, herring and mackerel) as well as on the migration of many groundfish species, namely cod, which is considered threatened at this time. The Northern Gulf is also an important corridor for several species of marine birds and various species of seals. The strait of Belle-Isle is well known as a passage for impressive icebergs and heavy ice flows from the Labrador coast during the spring. The targeted areas are right on the path of this ice, we hope that this is well taken into consideration.

We also raised questions about the scientific research and sources and we were very surprised to discover that the scientific research for many fish stocks through the Maurice Lamontagne Institute (federal research center) situated in Mont-Joli Quebec was little known to both, Amec and the Canada-Newfoundland and Labrador Offshore Petroleum Board.

Our questions about any potential exploration and exploitation of oil in the Gulf could not be included in this process to update this Strategic Environmental Assessment for Western Newfoundland and Labrador Offshore Area. We also tried to find out what were the subsequent steps to this consultation and that was also left unanswered. We have complained that this exercise was far too specific and basically intended to find out the preliminary position from the fishing industry on oil development in the Gulf.

Our fishers don't believe that this consultation was meant to gather information how the project of exploiting oil in the Gulf would really affect the environment and their fishing activities. They are aware that fishers knowledge is generally not recognized by the government unless it is backed up by scientific assessments.

No clear process on the decision making and on following steps with go no go targets were provided. If any development would take place, what will be the special measure taken to minimize the impact on fishing and the risk to the environment. In which way will the impact on the fishery will be measured and by whom. What insurance coverage will be required in order to assure fishers that in the event of a problem, they will be adequately compensated.

We wish to remind the government that we are required as fishers by the Department of Fisheries and Oceans Canada to adopt conservation oriented fishing practices that are sustainable in the long term and that will also support the rebuilding of stocks in difficulty. We would like to better understand how the federal government intends to promote the harmonization of our conservation efforts with the activities of the oil industry. Fishing activities have been around for over four centuries, what is the acceptable risk that we are prepared to live with to develop an industry that may only last for a limited period of 25 years.

This consultation process appears completely disconnected from the Department of Fisheries and Oceans objectives, no representatives of this department were invited. Our objective is not to be simply against oil development, but either sector should not supersede the other. We believe that it may be possible to develop both industries through collaborative work, but we don't seem to be starting on the right foot. It is actually structured in a way that our industry is left in the dark about the whole process that allows the proper evaluation of a project with the people first affected.

A Strategic Environmental Assessment alone appears insufficient to us, we are more concerned with how it integrates with the subsequent steps, the sensitivity of certain areas, the technology used, the evaluation of the risk, the go no go decisional process with criteria attached, the contingency plan in the event of an accident etc...

In subsequent steps, is there any plan to consult fisher representatives from the various regions affected as they will be the first one affected by this development. We feel that there is a need to put the whole process on the table, not only to show us the tip of the iceberg. It is not only a few people in the oil industry and from our government that wishes to see economic development and growth for the future generations. However, we want for it to be responsible development as we are required to do in the commercial fishery. Let's live by similar rules and if the risk is higher than the potential benefits, let's consider alternatives to correct the situation.

The fishing communities that live close to the areas and are adjacent to this potential development should receive all the possible information and have representatives for their fishing industry to be an important part of this educated decision. We are told that all citizens are responsible for economic development, however, we need to be involved in the decision making process in order to bear that responsibility.

We recommend to put in place an appropriate democratic process with all the steps from beginning to end included. We recommend a committee formed of fishery

representatives from the different adjacent regions affected with government representatives of the adjacent provinces involved. This committee should also include representatives from the Fisheries and Environmental Departments for these provinces, who have knowledge about the marine environment.

The federal government should support a fair rule system allowing the fishing industry which was there first to have a first say, based on proper assessments and promoting environmentally safe practices. We wish to promote durable employment in the long term for the benefit of not only this generation but also for the benefit of future generations around the Gulf of St-Lawrence. Let's work collectively with the people from the regions in adopting a sustainable economic development strategy.

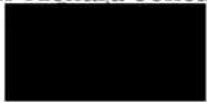
We are concerned that without an appropriate democratic process, the oil development in the Gulf will not bring the expected benefits, it may rather bring divisions and conflicts. We strongly feel that we need to work together when it comes to introduce new development on our fishing grounds. We are talking about a primary need for our people, quality food for the table, as well as a renewable resource for our long term economic prosperity. If there is something that we should protect, we believe it starts by what we can put on the table.

We are presenting this document and recommendations with a positive outlook. We hope you will receive this proposal favorably and we are hoping for some positive feedback as soon as possible. We understand that it may be a different process from what was done in the past in the Atlantic. However, we wish to remind you that we are dealing with a very different area when it involves the Gulf of St-Lawrence. It affects many more players and this could be a golden opportunity to do things right in such an environment. We want to collaborate, we want to participate, we want to develop, let's do it together, let's do it responsibly.

Shawn Buffitt, 2nd Vice-President (Lower North Shore Fishermen's Association)



Jean-Richard Joncas, President (Multi-Species Fishermen Association (Old Fort-Blanc-Sablon))



- c.c. Mr. Sean Kelly, Canada-Newfoundland Offshore Petroleum Board (St-John's, NL)
- Mr. Steve Bonnell, AMEC Environment & Infrastructure (St-John's, NL)
- Mr. Yves François Blanchet, Minister of Sustainable Development, Wildlife and Parks (Montreal, Quebec)
- Mr. Jonathan-Genest Jourdain, Federal deputy of Manicouagan (Sept-Iles, Quebec)