

October 18, 2019

RE: Request for Public Comments CNOOC International Flemish Pass Exploration Drilling Project

To Whom It May Concern,

The analysis conducted by the Impact Assessment Agency of Canada (the Agency) and its conclusions cannot be complete as they do not represent adequately the current use of resources and the applied values to international fisheries operations in the North Atlantic Fishing Organization (NAFO) regulatory area (NRA). I am a member of the international fishing industry originally from Newfoundland, my livelihood now depends on the fishery in the Flemish Pass basin. I have watched and felt the impact of O&G operations on the Newfoundland offshore.

As stated in this draft EA the potential negative effects from an oil spill may be low for shoreline coastal communities. However, any oil spill, will be detrimental to our year-round fishing operations, which in turn corresponds to an extremely high socioeconomic importance for many non-Canadian communities. Our company fishes it's allocated quotas as well as quotas from other contracting parties in the NRA. As well in the past we have fished in agreement, part of Canada's quota outside the Canadian EEZ.

The three oil spills that have occurred this year on the Newfoundland offshore shows that regulations for offshore O&G operations are outdated and do not reflect the needs of current and future potential expanding activities of the offshore oil and gas sector. The recent statement by the Newfoundland and Labrador minister of natural resources confirms that long suspicion. I do not have the expertise to understand O&G activities which is common with non-Canadian fishing operators. We presently feel the effects of existing projects with closed important areas, interference in our vessel movement patterns as we follow movement patterns of fish, and fish dispersion in areas of seismic testing. However, this environmental assessment once again lacks sufficient means to collect data on individual international operators, which have varying historical ties to this project area.

Also increasing literature is appearing on the negative effects of O&G activities on phytoplankton and zooplankton. We can see the fishery, but our eyes cannot see the plankton and unfortunately there is lack of proof and acknowledgement of how much O&G activities are affecting the smallest and most important elements of the marine ecosystem. It is necessary more scientific investigation to understand further these dynamics before more O&G projects are approved. The Proponent should participate more in research.

It is a conflict of interest for an organization such as the C-NLOPB to promote and regulate O&G activities. It is needed an independent inspection organization to make sure all regulation are updated and followed. Unfortunately, this and other EA do not address this issue.

Sincerely,

Deborah Gillies Da Mota