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**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

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Friday, January 3, 2020

Jeanne D'Arc Basin Exploration Drilling Project  
Impact Assessment Agency of Canada  
200 - 1801 Hollis Street  
Halifax, Nova Scotia B3J 3N4

**Re: Jeanne D'Arc Basin Exploration Drilling Project – Public Comments on Draft EA Report and Potential Conditions**

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments on the Husky Jeanne D'Arc Basin Exploration Drilling Project's Draft Environmental Assessment Report and Potential Conditions in relation to the project. FFAW-Unifor submitted comments on the Draft EIS documentation in 2018.

FFAW-Unifor represents approximately 15,000 working women and men throughout Newfoundland and Labrador, most of whom are employed in the fishing industry. The inshore fishery is prosecuted by small boats up to 45 feet in length while 45 to 90-foot vessels fish out to, or just beyond, the 200-mile limit. The fishing vessels in the inshore fleet are owner-operated enterprises. Most targeted species have set Total Allowable Catches (TACs) while trip limits and enterprise caps may also be designated depending on season and/or area.

As we have commented previously, activities associated with the exploration, development and production of offshore oil and gas are very concerning to fish harvesters who see the cumulative effects of oil and gas activities on the water over time.

Commercial fishing can occur within all four of the exploratory licences discussed in this report. As Figure 4 details (page 56), three of the four ELs have significant recent history of intensive fishing effort.

**Just as recoverable oil and gas is not found everywhere in the ocean, concentrations of valuable commercial species are not found in all areas of**

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**the ocean.** The Agency noted that exploration licences overlap with small percentages of the area available to fish in NAFO Division 3L (page 59). The “proponents stated that the project area does not include unique fishing grounds or a concentrated fishing effort that occurs exclusively within the project area, nor is it likely to represent a substantial portion of a customary fishing area for any fisher” (page 88).

These comments demonstrate a lack of understanding of how various fisheries are managed and prosecuted and the various restrictions placed on individual licences and/or fish harvesters. We also take exception to the disingenuous commentary/statistics presented on page 59 with respect to the opportunity for the fishing industry to fish elsewhere.

Further, while a relatively small area would be temporarily closed to fishing from this individual project at any point in time, it does translate into a larger cumulative impact for the various projects under development and/or review by the Agency. The point continues to be missed that loss of access to fishable areas from multiple projects may impact economic return generated from fisheries. **In this context, the socioeconomic impacts of offshore drilling are not being fully considered or appreciated in these assessments.**

We’ll take this opportunity to also advise that shrimp or crab have not been placed under moratoria as stated in the document (page 24). Shrimp Fishing Area 7 is currently closed to shrimp fishing. The more northerly areas (SFAs 1-6) remain open to fishing. There is no moratorium placed on shrimp. Snow crab quotas have seen some reductions (and increases) in various areas over the last number of years but significant quota cuts that may have been speculated along the northeast coast in 2019 (NAFO Division 3K) have not happened. There is no moratorium placed on snow crab.

We look forward to engagement/consultation with the proponent on developing effective communication mechanisms and incorporating them within a Fisheries Communication Plan and Wellhead Abandonment Strategy. A procedure to communicate monitoring results (page 77) would also be welcomed.

In our experience, two weeks is not a sufficient timeframe to inform fleets of drilling locations, safety zones and supply vessel transit routes. Planned activity with specific location and transit routes detailed would be imperative to communicate to a fishing fleet several months in advance. Depending on the time of the year, fishing gear could be set in the exact location of the planned well site. While mitigations may be listed in the document and “implemented” by the operator, mutual understanding, communication and cooperation on the water will be critical.

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It is hoped that the proponent will make considerable effort to keep the fishing industry regularly informed of its activities as they are in very close proximity to actively fished areas offshore.

If you have any questions or comments, please feel free to contact the undersigned.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison