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Wednesday, March 18, 2020

West Flemish Pass Exploration Drilling Project
Impact Assessment Agency of Canada
Newfoundland and Labrador Satellite Office
John Cabot Building, 10 Barter's Hill, Suite 301
St. John's, NL A1C 6M1

Re: West Flemish Pass Exploration Drilling Project – Public Comments

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments on Chevron's West Flemish Pass Exploration Drilling Project Environmental Impact Statement. FFAW-Unifor represents approximately 15,000 working women and men throughout Newfoundland and Labrador, most of whom are employed in the fishing industry.

As an important part of the review of this project, FFAW-Unifor recently conducted two meetings in eastern Newfoundland to inform fish harvesters, in their home communities, about this proposed drilling project. (Additional meetings were scheduled but had to be cancelled due to social distancing protocols recently put in effect). The meetings served to further engage harvesters in discussion related to impacts of oil and gas activities on the fishing industry as well as associated risks to the industry such as loss of access to fishing grounds and oil spills.

Activities associated with the exploration, development and production of offshore oil and gas continue to be very concerning to fish harvesters who see the cumulative effects of all of the activities on the water over time. In the case of this proposed project, there is limited documented fishing activity within the Exploratory Licence. However, caution should be taken by the proponent as fisheries data documented in the report is dated and in some cases not available (redacted) due to rules around privacy. It is recognized that this is the best information available to the proponent. Some of the "conclusions" made with respect to the fishery in the document are, however, inaccurate.

The fishery is highly dynamic and fisheries quotas change from year to year based on science, analysis of catch and other assessment tools. From this information, management decisions (by Fisheries and Oceans Canada (DFO) and the Northwest Atlantic Fisheries Organization (NAFO), depending on the species) are then made to ensure that fisheries remain sustainable. Only a small percentage of the available stock biomass is harvested. The value of the fishery also changes from year to year based on quotas, market price fluctuations, and at times due to weather and/or ice.

It is important that the proponent (and the Agency) understand that the area proposed for drilling may see some commercial fishing up until the exploratory licence expires in 2025. *Fishery closures and quotas can change from year to year.*

It is critical that effective and regular communication ensue with the fishing industry throughout the EL lifespan such that the proponent is kept apprised on ongoing developments within our dynamic fishing industry.

There are up to eight wells proposed for this project in EL 1138, located outside of Canada's 200 mile limit. The supply vessel route proposed for this project transects across many inshore fishing areas. As stated in the report, additional supply vessels servicing the various exploratory drilling projects may have an impact on fishing activities along the transit route. The apprehension felt by harvesters about losing gear in a high traffic area cannot be measured. Harvesters may move their gear to lower traffic areas.

Mitigation measures have been required as part of a company's authorization to conduct seismic work in the Newfoundland and Labrador offshore. These measures include temporal and spatial avoidance of actively fished areas, fisheries science/research surveys and known spawning aggregations of various species. These types of mitigations, to our knowledge, have not been a part of the course of action for exploratory drilling to date. The fishing industry would like to see more specific mitigations that consider fishing activity along transit routes in this instance.

Following wellhead decommissioning it is noted that locations for abandoned wells will be provided enabling harvesters to **avoid** these locations in the future. Due to the nature in which fishing gear is "set" it is challenging to avoid a particular location. What most often results is the avoidance of a larger area in order to stay clear of one particular coordinate. There are eight wells proposed which could amount to considerable avoidance, i.e. less fishable area.

It should also be noted that the harvesting sector fishes deeper than 900 metres at times. Harvesters should be consulted regarding any plans for leaving wellheads

above the seafloor. Discussions should also involve the C-NLOPB regarding wellhead retrieval/abandonment at all depths prior to decommissioning activities.

Finally, there is some required clarity with respect to the development of a Fisheries Communication Plan for *commercial fish harvesters*. The commercial fishing industry would like to be engaged during the joint development of the plan, particularly with respect to its goals/expectations. There is also a need to review the risk management matrix guidelines that have been developed through One Ocean to include consultation on the need for a Fisheries Liaison Officer and/or Fisheries Guide Vessel for rig moves within the offshore.

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

Kind regards,

Robyn Lee
Petroleum Industry Liaison