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Saturday, April 4, 2020

BHP Canada Exploration Drilling Project
Impact Assessment Agency of Canada
200 - 1801 Hollis Street
Halifax, Nova Scotia B3J 3N4

Re: BHP Canada Exploration Drilling Project – Public Comments

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments on BHP Canada's 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 intended to conduct a series of meetings in eastern Newfoundland to inform fish harvesters, in their home communities, about this proposed drilling project. Unfortunately, scheduled meetings had to be cancelled due to social distancing protocols recently put in effect. The meetings would have 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 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 Licences. However, caution should be taken by the proponent as our ocean is dynamic and this situation could change. This is particularly important to consider when discussing well abandonment planning. Therefore, fish harvesters should be consulted regarding any plans for leaving wellheads above the seafloor.

There are up to twenty wells proposed for this project in ELs 1157 and 1158. The supply vessel route proposed for this project transects across many inshore fishing areas. As noted 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.**

As for this project, there was also several mentions made of the One Ocean Risk Management Matrix Guidelines throughout the EIS document. The intention of these guidelines is to consult with the fishing industry prior to transit-tow operations to discuss mitigations regarding the use of a Fisheries Liaison Officer **and** a Fisheries Guide Vessel. The discussions would be based on the level of fishing activity **along** the transit route as well as the end point of the transit. Concerns have been expressed from harvesters about mitigations that should be put in place regarding regular supply vessel transits as well.

We look forward to continued effective communication with BHP throughout the EL lifespans such that the proponent is kept apprised on ongoing developments within our dynamic fishing industry. It is challenging to predict fishing activity and closures into the future as things can vary from year to year but ongoing consultation is critical.

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

Kind regards,

Robyn Lee
Petroleum Industry Liaison