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Central Ridge 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: Central Ridge Exploration Drilling Project – Public Comments

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments on Equinor's Central Ridge Exploration Drilling Project Abridged 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 program, FFAW-Unifor recently conducted eleven meetings throughout eastern Newfoundland to inform fish harvesters, in their home communities, about this proposed drilling program. 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 are very concerning to fish harvesters who see the cumulative effects of all of the activities on the water over time. In the case of the proposed project, the western portions of both Exploratory Licences are located on valuable commercial snow crab fishing grounds. Furthermore, the shelf edge is an important habitat for many other marine species throughout their various life stages.

The potential for any exploratory drilling related to this project to interact with and directly affect the fishing industry will be highly dependent on the nature, location, timing, activities and the equipment and/ or gear involved. While the EIS document

discussed potential impacts to commercial fishing, it concluded that “exploration drilling activities on ELs 1159 and 1160 are not likely to result in significant adverse cumulative environmental effects on Commercial Fisheries and Other Ocean Users in combination with other projects and activities that have been or will be carried out” (page 464). **The fishing industry does not concur with this conclusion.**

Drilling installations and associated activities (including safety zones) **can** have a significant impact on the fishing industry. When a “safety” zone is designated around a drill rig the temporary loss of fishing access appears as a small dot on the map. However, activity in the vicinity of that “dot” may continue to develop over the years and the exclusion zone to fishing may grow larger. Over time, the acreages of exploratory licences, significant discovery licences and production licences have amounted to considerable land “ownership.” Land ownership continues to increase in the Newfoundland offshore and beyond.

When discussing impacts related to exploratory drilling (and production), it is important to consider not only the footprint of the drilling, but the associated activities (e.g., the setup and moving of the rig, associated vessels, etc.) that could also interact with fishing activity.

Additional supply vessels servicing the various exploratory drilling programs **can** also impact fishing activities. For example, while a compensation program would help those who could identify the source (e.g. supply vessel) of gear entanglement, the apprehension felt by harvesters about losing gear cannot be measured. Harvesters may move their gear to lower traffic areas. It should also be noted that supply vessel routes are **not** established to the areas where exploratory drilling will be taking place (page 437) and an 8% increase in traffic (page 48) should be considered cumulatively with other anticipated projects. For example, there is an expectation that three exploratory drilling projects will be taking place this spring/summer which would equate to an increase in traffic of 24% (if the statistic documented in the EIS is valid).

Related to rig and supply vessel traffic, concerns regarding invasive species were broached at meetings with harvesters regarding the movement of rigs (and supply vessels) for exploratory drilling programs, even within bays in Newfoundland and Labrador. Specifically, harvesters in Trinity Bay and Bonavista Bay are very concerned about the invasive green crab species being transferred and introduced inadvertently from Placentia Bay. This was discussed in the document (page 337) as a potential threat to aquatic ecosystems.

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.

Although ongoing communication to keep the fishing industry apprised of drilling locations and timing of activities is important and discussed in the document (page 436) there was no mention of the development of a specific **Fisheries Communication Plan** (with the fishing industry). It is an expectation by the fishing industry that this Plan be jointly developed, a condition of authorization on other exploratory drilling projects to date, and go beyond communication to date that has provided little to no advance notice of drilling programs.

Issuing a Notice to Shipping and/or Notice to Mariners (pages 437) of the precise location and associated safety zone is **not** considered a mitigative measure by the fishing industry. (These Notices are usually issued the day before, or on the day that the operation is about to happen). There should be no expectation that fish harvesters will willingly alter fishing plans to mitigate space-use conflicts. This could become highly problematic going forward depending on any anticipated drilling location in areas of competing interests.

This communication extends to information pertaining to wellhead decommissioning or suspension (pages 47, 438). Harvesters should be consulted regarding plans for leaving wellheads above the seafloor as the document mentions that if wellheads are left in place harvesters will have to avoid these locations (page 438) going forward. This **will** impact fishing activity beyond the temporal scope of the exploratory drilling activity being proposed.

Discussion of the commercial fishery in this document was somewhat disjointed. While irrelevant to the area where drilling is anticipated to happen for this project it should be noted that the snow crab closures identified on page 235 should be mapped to provide context as to the actual spatial scale of the closures (on the boundaries of the different management areas, not the full management areas). Further, the shrimp fishery in SFA 7 is **not** under moratorium (page 248). This area is currently *closed* to shrimp fishing. It is not expected to reopen in 2020 however. For clarity, it should also be noted that the crab fishery, and its associated post-season survey, is conducted to the edge of the continental shelf (outside the 200 mile EEZ). As well, with respect to the comment related to a safety zone providing protection to overfished species (page 33 of the summary document), a much broader understanding of fisheries management is warranted.

It was recognized by the proponent that offshore exploratory drilling operations with both domestic and foreign fishing vessels will need to be *coordinated* (page 249). A suggested proactive approach forward is a candid discussion between the fishing industry and the proponent to gain a better understanding of the potential impact that exploratory drilling may have on the fishing industry, specifically the displacement effect of the industry.

The fishing industry fully understands the benefits of the oil and gas industry to our economy. In fact, the fishing industry of Newfoundland and Labrador has never been fundamentally opposed to offshore oil exploration, development or production.

Growth of one industry however must not come at the expense of another.

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

Kind regards,

Robyn Lee
Petroleum Industry Liaison