



June 14, 2023

**Re: Impact Assessment Agency of Canada Public Comment Period on the Environmental Impact Statement Summary for the Tilt Cove Exploration Drilling Project**

To Whom It May Concern,

Please accept the following comments in connection with the Environmental Impact Statement (EIS) Summary for the Tilt Cove Exploration Drilling Project on behalf of the Fish, Food and Allied Workers' Union (FFAW-Unifor) and prepared for Suncor Energy (Suncor).

The sheer magnitude of the project scope covered by this EIS warrants significant concern for fish harvesters. The proposed temporal scope initiates drilling in Q2 2024 and extends to the end of 2029, potentially drilling 12 to 16 wells, with exact design and locations of these wells not yet determined. The estimated 7 km<sup>2</sup> that will be inaccessible to fishing vessels for periods up to 120 days *per well* is worrisome and it is challenging to fully understand the collective impact without all relevant details. We would request further clarification on the spatial scope of this project as soon as it becomes available.

This EIS discusses ongoing, year-round drilling operations and movement of equipment and personnel from the Mobile Offshore Drilling Unit (MODU) to land. Year-round drilling and the associated vessel traffic from the project site to land will interfere with numerous active fisheries and may impede fishing vessels from their usual routes. Fishing alternate routes and consequently alternate grounds generally means harvesters infringe on another harvester's "territory" and/or increase their steaming time. As well, commercial species are not equally distributed throughout the ocean. Therefore, the impacts of project-related activities in the next few years will affect many harvesters in and around the entirety of NAFO Division 3L, that is, not just those who fish directly adjacent to project activities. All inshore harvesters in 3L will be subjected to increased risk of gear/vessel loss and damage, accidental spills, as well as reduced safety on the water, access to fishing grounds, and catch rates because of this project.

Suncor presented details of this project to FFAW-Unifor in February of this year. Fishing data from 2018-2020, exclusively, was used to outline potential interactions with various species throughout the lifespan of this project. The claim in this EIS that fishing activity in this area is limited is misleading. Snow crab is Newfoundland and Labrador's most profitable fishery and is heavily fished in 3L. It should be noted that since 2020, quotas have since significantly increased. Harvesters are now fishing in expanded areas that are not reflected or considered in documents presented to FFAW-Unifor at that time. Furthermore, it was noted that the shrimp fishery within the project area is currently closed. Due to the timeline of the project, future considerations need to be given in the event this fishery resumes. Additionally, surf clam fishing



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activity occurs directly within the project area. We are requesting fishing data for 2021 and 2022 be reviewed and incorporated into forward-looking plans for this project.

Drilling fluids, excess cement, cuttings, and other resulting residue that ultimately get released directly to the seafloor from regular drilling operations contain harmful pollutants which when incorrectly disposed can severely and negatively affect marine flora and fauna. The study used to support the claim that there is little to no risk of bioaccumulation of drilling-based chemicals in this EIS summary is over 20 years old. Any foreign substance released, large or small, can have immediately and far-reaching environmental impacts on the marine environment including the fish and fish habitats of species our members rely on.

While the claimed likelihood of a large-scale accidental event is low, as we have seen, large-scale accidental events do happen. In fact, Suncor was responsible for spilling 26,400 litres of synthetic-based mud in the Jeanne d'Arc Basin from the Henry Goodrich rig in 2011.

Language within the EIS pertaining to "relatively smaller volume" spills minimizes the significance of an oil spill. Oil exposure has resulted in lethal and sublethal developmental effects in fish and to say the risk imposed on these species is dependent solely on the extent and duration of spill is both disheartening and false. We do not agree that a mitigative factor for oil spills exists when that spill does not cover the full geographic extent of a spawning range for a particular species. Should a subsurface blowout occur during seasonal migrations or particular life stages of fish species, there are additional, harmful effects that may impact profitability of the fishery not only presently but for future generations.

We appreciate Suncor's "zero tolerance" policy towards spills and expect this to be strictly enforced. We look forward to reviewing the project-specific Oil Spill Response Plan once it becomes available.

Anthropogenic noise associated with this project poses additional, detrimental risks to our industry. This EIS summary clearly states project activities "may lead to a reduction in landings for certain commercially fished species" due to underwater noise from seismic surveys and air gun sources. This is dismissed in the document due to these negative behavioral responses being short term in nature. Fishing seasons are also short term in nature. Estimating that affected species will recover within a few years is ignorant to the fact that the economic success of fisheries is dependent on consistent populations year after year. One season of poor return can have catastrophic implications for the fishery the following year.

The removal strategy for wellheads in this EIS is said to consider potential interactions with fishing activities; however, the abandonment program has not yet been defined. There is no context provided on when FFAW-Unifor can expect these plans or what mitigation measures will be used to avoid fishing activity interactions.



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We refute the claim that most likely adverse effects will be mitigated. The shared seascape housing the project area and many fisheries is a fluid one. Localized effects on the marine environment of any magnitude or duration can be detrimental to the fishery and other surrounding ocean users. There is an admittance that project activities may influence biological and physical aspects of the marine ecosystem. The Grand Banks are a highly reproductive area for plankton and other keystone species that support healthy and sustainable fish populations. It is significant that there are 23 fish species of conservation concern that potentially occur within the project area. This area represents an important feeding and spawning grounds for various species and the implications of this project in addition to the cumulative effects of all oil and gas related projects within the Jeanne D'Arc Basin moving forward will not be fully understood for quite some time.

It is disappointing no follow-up or monitoring programs are proposed for the impacts of these project activities on commercial fisheries or other ocean users. How will we understand the potential long-term effects without the proper monitoring programs in place?

We do not agree there is a "high level of confidence for a prediction of no significant adverse environmental effects" and it is highly irresponsible not to monitor these effects based on that statement. We have concerns surrounding the lack of messaging on what Suncor plans to do in anticipation of this project affecting Canada and NL's ability to meet their respective emission reduction targets for greenhouse gas. This is simply stated in the document with no mitigation techniques provided or mention of any repercussions. We understand NL has a "long history" of oil and gas exploration, but modernization of these "well-established" oil producing operations is required. The ocean is a dynamic environment subsequently experiencing increasing changes as we navigate climate change.

It should be noted that this EIS Summary commits to communication with DFO regarding timing and locations of planned research such as the longline halibut survey and the post-season crab survey. FFAW-Unifor facilitates both these programs. We must be engaged in these consultations.

This document emphasizes *timely* communication with fishers. There have been instances in the past by which representatives at Suncor did not reasonably consult with FFAW-Unifor in a timely manner in advance of oil and gas related activities occurring within active fishing grounds. Less than half a page of the summary document is dedicated to fisheries stakeholder engagement. There are no plans or context provided surrounding the nature of future consultations or any timeline commitments. We have the expectation that early and effective communication between Suncor and FFAW-Unifor will ensue should this project move forward, particularly given drilling is anticipated year-round.

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The fishing industry fully understands the benefits of the oil and gas industry to our economy. In fact, the fishing industry 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.**

FFAW-Unifor would like to thank you for providing an opportunity to comment on this EIS summary. If you have any questions or comments, please feel free to contact the undersigned.

Kind regards,

Katie Power  
Energy Industry Liaison