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January 10, 2024

Cooper Cove Marine Terminal Expansion Project  
Impact Assessment Agency of Canada  
200-1801 Hollis Street  
Halifax, Nova Scotia B3J 3N4

To Whom It May Concern,

Please accept the Fish, Food and Allied Workers' Union (FFAW-Unifor) comments regarding the Initial Project Description for the Cooper Cove Marine Terminal Expansion Project proposed by the Port of Argentia (POA). FFAW is Newfoundland and Labrador's largest private sector trade-union servicing over 10,000 professional fish harvesters in this province. We represent a key ocean stakeholder with particular interest in NAFO fishing area 3Ps, including Placentia Bay and the POA. The inshore fishery in NL contributes over \$1 billion to the provincial economy annually, therefore, meaningful inclusion throughout the planning phases of this development will greatly reduce the potential economic loss imposed on the fishing sector during future activities. So far, forthcoming information and invitations for participation and feedback as part of this process have been timely and appreciated by the union.

As mentioned throughout the project documents, Placentia Bay has a rich historical and social context defined by its coastal communities, their relationship with the sea and their reliance on a sustainable fishery for economic prosperity. The health of the ocean and protection of biologically renewable resources, like commercial fish species, are at the forefront of members' minds when new developments within these shared ocean spaces are proposed. The project description mentions a decline in fish stocks within the project area and cites this as a reason communities within the bay have diversified their economic endeavours (page 81 section 6.6.6.2). While this may be partially true, it would be more accurate to say that fish harvesters diversified the species at which they fish. While there is no commercial cod fishery in 3Ps, fish harvesters in Placentia Bay have found economic success in other species, including lobster, crab, scallop, herring, and sea cucumber among others. The fishing community within Placentia Bay remains steadfast.

Effective information sharing will be a major mitigator for potential fisheries interactions. Depending on the timing of activities, it is very likely commercial vessels will transit nearby. Details surrounding potential in-water blasting, infilling and wharf construction and the associated safety zones that may reduce transit and fishing areas for our members must be clearly communicated well in advance. Early and continuous engagement will ensure awareness of respective activities in such a

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way that avoidance mechanisms can be considered and implemented without conflict. Much of the fishing data, with respect to species distributions, open and closing dates, and licencing information should be made available by DFO.

Of the potential residual effects outlined during construction and operations, the marine environment is of utmost concern for our membership. FFAW will not support projects intending to undertake activities resulting in permanent loss fish of habitat. Dredging activities, again, will have to be openly communicated in a timely manner and all efforts must be exhausted with respect to the avoidance of fish and fish habitat. Harvesters are justifiably concerned about the potential release of deleterious substances including petroleum hydrocarbons and other chemicals. Enhanced planning and mitigation measures will be required here as to ensure accidental spills do not occur.

Dredging activities and specific areas that will close for the project must be appropriately communicated to FFAW in the event of potential interaction. There is an expectation that ground disturbances will be minimised and work will be scheduled as to avoid potential fisheries interactions. Underwater blasting should be scheduled in consultation with FFAW as well as DFO.

The timing and seasonality of the commercial fishery in Placentia Bay is unique. Fish harvesters in this region (3Ps) are typically the first to start fishing and the first to finish. Scallop, crab and lobster fisheries in this area are contingent on undisturbed fish habitat and vessel access to such. Dredging activities have potential to destroy productive fishing grounds and prevent access to these same areas. It is imperative fish harvesters in 3Ps are given, to the best of the proponent's abilities, uninterrupted access to these fishing grounds during their fishing seasons, as fishing seasons are short in duration. There are over 700 snow crab fishing licences in 3Ps alone and this species is the most predominantly fished in the region. In saying that, due to the nature of the lobster fishery and it being persecuted very near shore, particular considerations must be given to ensure protection of lobster habitat in and around the project area.

Commercial fisheries in NL and Placentia Bay carry significant economic, social, and cultural importance to community members surrounding this project. Fishing seasons for each species are location and time specific and can vary from year to year. It is imperative that there is an effective flow of information between the fishing industry and the proponent on a regular basis.

We greatly appreciate the opportunity to provide feedback at this stage and trust continuous consultations and engagement with our organization will ensue. If you have any questions or comments, please contact the undersigned.

Kind regards,



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Katie Power  
Industry Relations Representative, FFAW-Unifor

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