

**REGIONAL ASSESSMENT OF OFFSHORE OIL AND GAS EXPLORATORY DRILLING
EAST OF NEWFOUNDLAND AND LABRADOR
Technical Advisory Group (TAG) Session on *Commercial Fisheries*
September 9, 2019
QUESTIONS AND ITEMS FOR DISCUSSION
PARTICIPANT INPUT FORM**

Name and Affiliation :

Kris Vascotto, Executive Director of the Atlantic Groundfish Council and the Atlantic Fixed-Gear Council;
and,

Carey Bonnell, Vice President of Sustainability with Ocean Choice International

1) Key fishing activities and areas

- a) Are there any key fishing activities, locations and times that you would like to identify, including any particularly important and sensitive areas within the Study Area (current and potential future fisheries)?
- We have such areas identified but are concerned at providing the underlying data given the intent of the committee to post these responses publicly. These are derived from confidential information developed over decades of directed activity and sharing publicly is highly concerning for us.
 - We would be willing to attend a confidential session with the REA Committee to demonstrate and review our data holdings and provide the underlying rationale for the submission of polygons that we consider of current 'high value'. We will not share the underlying, confidential information.
 - We have no concern with the presentation of summary polygons, provides they are incorporated functionally into the outcomes of the REA as either 'heightened sensitivity' or 'avoidance' zones. If these polygons are simply being presented for information only, we suggest that there is no value in either us putting the necessary effort to build the polygons, nor for the REA to consider them.
 - We are willing to provide polygons that we consider 'important'. We ask for a private discussion with the committee to provide the underlying rationale

2) Fisheries information and datasets

- a) Do you have any suggestions for fisheries related datasets and information sources that should be considered in the Regional Assessment (current and future fisheries)?
- b) Do you have any suggestions for the analysis, use and presentation of fisheries data in the Regional Assessment?
- DFO can provide granular landings and effort data provided that privacy concerns are addressed for groundfish species. Again, we are concerned with the posting of this information publicly and would be willing to help facilitate accessing this information, provided that the committee worked to keep this information private.
 - We encourage the committee to review longer time series of data than generally employed. For instance, many fisheries, while recovery, remain in a state of moratorium. This means that no 'current' footprint is available for assessment and we recommend that the scope of assessed information include geo-referenced catches from pre-moratorium period. This information is available both from DFO and our own records.
 - We hold extensive local fishing effort and landings that spans decades. We are willing to review this information with the REA committee but will not distribute publicly.
 - We suggest that the most effective approach may be allow the Fishing industry identify important polygons for formal exclusion zones (for fear of displacement)/heightened sensitivity zones. This information could be presented in a spatial manner in the final REA.
 - Effort and landings data, while valuable, is difficult to interpret spatially, given that important fishing zones for one species with a low total quota may seem of low importance relative to a fishing zone for a species with a high quota (while in actual fact, this could not be further from the truth). For this reason, we recommend that the assessment be conducted on a species by species basis (both eligible for directed fishing and moratorium species) and presented as simplified polygons using the industry-driven zonal approach described above. We are willing to assist in this process.

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3) Potential interactions between offshore exploratory drilling and fisheries

- a) In addition to the issues and interactions listed in the backgrounder for this session, are there any others that should be considered in the Regional Assessment?
- **Potential Permanent Loss of Areas** – we note that the package discussed temporary loss of access. We wish to expand this to include permanent loss to areas, should exploratory wells prove to be successful. We feel that it is disingenuous to suggest that exploratory activity only should be considered – we are deeply concerned about activities pre- and post- exploration drilling. If an exploration well (assumed to be limited local impact) located in a core mobile gear fishing area is found to be successful, a drill center/collection network is highly probable in the future. If the current exclusion zones applied to producing fields (i.e. 10 nm) is considered, this can wholly encompass fishing areas, rendering fisheries non-viable. This must be considered in an exploratory context.
 - This also extends to locally productive areas that undergo sedimentation and no longer represent 'valuable' habitat for the aggregation of fish for potential harvest. While the drilling activity may lead to limited local impacts, these impacts may be sufficient to reshape fish distribution because of a loss of forage/otherwise, meaning the impacts are potentially much larger than suggested by a 'short-term drilling program'.

4) Existing and potential mitigation and follow-up requirements

- a) In addition to the standard measures listed in the backgrounder for this session, do you have any suggestions for any required new or different ones?
- b) Do you have any suggestions for issue- or situation-specific (certain activities, areas, times) measures that should be considered?
- **Voluntary Exclusion Zones** - High value areas identified by the fishing industry should be considered off-limits for exploration activity, or exploration may be conducted with heightened mitigation measures, including an acknowledgement that extraction activities will not be permitted. This approach will blunt many of the concerns of the fishing industry.
 - **Heightened Sensitivity Zones** – Highly productive fishing areas SHOULD have a heightened level of mitigation applied to them and be treated 'differently' from other areas free from other marine users. These zones should include a more detailed assessment of the baseline conditions, potential short- and long-term implications of both status quo operations and catastrophic failures.

5) Do you have any other input or recommendations that you would like to provide to the Committee on this topic?

- **Avoiding impacts is the best mitigation possible.** We suggest that avoiding important fishing areas through exclusionary zones continues to be the best approach for addressing our concerns related to oil and gas exploration drilling activities.

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