

DRAFT RA Report Reference	DFO Comments
<p>3.2.4 – Special Areas</p> <p><i>“NAFO Fisheries Closures”</i></p>	<p>In reference to areas closed to bottom contact fishing to protect identified VME areas. To avoid possible confusion with other closure measures relating to fisheries management. It would be best to use “Area Restrictions for Bottom Fishing Activities” which is the specific terminology from the NAFO measures that delineates the VME closures.</p>
<p>3.2.4 – Special Areas</p> <p>Figures 3.10 and 3.11</p>	<p>Figures 3.10 and 3.11 should be relabeled as “Federally Identified Special Areas within the Study Area” and “Internationally Identified Areas within the Study Area”.</p> <p>Use of the Term Designated is misleading when referring to all of the areas together.</p>
<p>3.3.1 - Fisheries</p> <p>General Comment</p>	<p>There is no reference to the International Commission for the Conservation of Atlantic Tunas.</p> <p>The International Commission for the Conservation of Atlantic Tunas (ICCAT) is an intergovernmental organization responsible for the management and conservation of tuna and tuna-like species in the Atlantic Ocean and adjacent seas.</p> <p>Of note, ICCAT is included in Table 7.1 Potential Implications of Offshore Exploratory Drilling on Canada’s Ability to Meet its Environmental Obligations, page 172.</p>
<p>3.3.1.1 – Commercial Fisheries Domestic</p> <p><i>“The available DFO fish landings (weight and value) statistics for the last five year period (up to 2017), which include domestic and foreign fish harvests that are landed in Canada”</i></p>	<p>Landings data in Canada do not include foreign landings in Canada unless the authors specifically requested this from Statistics Branch, authors may want to verify.</p>
<p>3.3.1.1 – Commercial Fisheries Domestic</p> <p>Page 72 (two references)</p>	<p>The 3M shrimp re-opened to directed fishing January 1, 2020 following a decision taken by the NAFO Commission at the September, 2109 Annual Meeting.</p>
<p>3.3.1.3 – Fisheries Surveys</p>	<p>There is no reference to international fisheries surveys conducted in the NAFO Regulatory Area by the EU; these studies are referenced later on page 83.</p>
<p>3.3.2 - Indigenous Communities and Activities (page 78)</p>	<p>1. This statement is not correct and it is suggested that it be removed from the paragraph.</p>

<p>1. <i>“Indigenous peoples have a constitutionally protected right to fish for FSC purposes.”</i></p> <p>2. <i>“Innu Nation and the Nunatsiavut Government hold the nearest FSC licenses to the Study Area in NAFO Division 2J.....”</i></p> <p>3. <i>“NunatuKavut Community Council have the right to fish under FSC near the South Coast of Labrador and Upper Lake Melville.....”</i></p>	<p>2. This sentence is not correct. The NCC holds a FSC licence for the South Coast of Labrador that is geographically closer to the Study Area than either the Innu Nation or the NG.</p> <p>3. Suggest removing “have the right to” from the sentence, the NCC FSC fishery is not a “rights” based fishery and the use of the word “right” could cause confusion or misinterpretation.</p>
<p>3.4.2.2 - Fisheries and Other Socioeconomic Components</p> <p><i>“The finest spatial resolution this dataset provides is to the NAFO Unit Area level, and the most recent year for which these data are currently available is 2017”</i></p>	<p>DFO Regional Statistics provides up-to-date fisheries data more recent than 2017. Up-to-date publicly available fisheries data is already posted on DFO's internet site. Data requests can also be made through regional DFO Statistics. Data that does not meet Privacy Act requirements cannot be shared publicly by DFO (unless the Privacy Act is changed).</p>
<p>3.4.2.2 - Fisheries and Other Socioeconomic Components</p> <p><i>“It is important to note that the commercial fisheries datasets provided by DFO, particularly in recent years, are substantially redacted by DFO for confidentiality reasons prior to their release to external users”</i></p>	<p>DFO releases data on fisheries in accordance with the Privacy Act. Assessments on confidentiality and data redaction are in-line with the provisions of the Act. Changing how DFO reports data would require changes to the Act.</p>
<p>3.4.2.2 - Fisheries and Other Socioeconomic Components</p> <p><i>“For the purposes of the Regional Assessment, geospatial fisheries data were also provided by NAFO in the form of vessel monitoring system (VMS) data for fishing vessels operating within the NRA. <b>Vessel position reports for vessels travelling between 0.5 and 5 knots (indicative of fishing activity) were combined and then gridded into cells to show various pre-set categories of fishing intensity across the area in question. The dataset provides information on fishing activity levels, by month for the years 2014 to 2018, but does not indicate species, gear type or other factors. This is, however, the first instance where such international fisheries data have been made available for use in an environmental assessment in the Newfoundland and Labrador offshore area, and therefore represents an important first step in filling this long-standing data gap.</b>”</i></p>	<p>As you are aware, following additional consultation and clarification from the NAFO Secretariat, it was our direction to IACC that this this data will not be made available on by month for the years 2014 to 2018 as described, but only to inform the broad overview as illustrated in Figure 3.14 Overview of International Commercial Fishing Activity in the Study Area (2014-2018). The text in red should be removed.</p>