



**The Maritime Fishermen's Union  
L'Union des Pêcheurs des Maritimes**

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Elizabeth MacDonald  
Canada-Nova Scotia Offshore Petroleum Board  
8th Floor TD Centre, 1791 Barrington Street  
Halifax, Nova Scotia  
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**Re: Draft Strategic Environmental Assessment for the Sydney Basin  
and Orpheus Graben Areas**

The Maritime Fishermen's Union Local 6 is a fishermen's organization that has been in existence since the late 1970's. Our organization has consistently been concerned with offshore oil and gas development in our fishing areas and on our fishing grounds. We appreciate the chance to provide feedback on the environmental assessment for the Sydney Basin and Orpheus Graben Areas.

The two fisheries that are of greatest concern to our members are snow crab and lobster.

1. **Seismic and snow crab** - The snow crab fishery is an important economic generator for fish harvesters in this area. It supports harvesters, their families and communities. Our snow crab fishermen believe that seismic activity has, in the past, had significant negative affects on this fishery. In light of that first hand experience, we believe a responsible, precautionary approach to managing the risk to our fishery would be to first require research that could prove conclusively that snow crab stocks are not adversely affected by seismic activity. Until this is done, we cannot support activity that has

potential to again disrupt this valuable fishery.

2. **Seismic and Lobster** – Because the potential exploration areas are very close to the existing lobster grounds and because lobster is the mainstay of our fishery today we have grave concerns regarding potential impacts. The loss of, or even damage to the lobster fishery would have devastating long term affects.
  
3. **Economic Balance** – The fishery in this area is long-established and sustainably managed. We ask if there is a fair balance of risk between investors and drilling companies, for whom this is simply one small opportunity, as opposed to the many fishing communities that rely completely on a healthy fishery. While short term benefits might flow to provincial and federal coffers from oil and gas, long losses from the fishery would more than offset those gains. We feel the long- term benefits to the environment, the economy and communities lie with fish.

**4. Compensation** – “Should the above measures be unsuccessful in preventing adverse environmental effects to marine fisheries or other components of the socioeconomic environment (such as gear damage due to interference with seismic streamers, or in the unlikely event of a large offshore oil spill in the area), **a variety of processes and measures exist to compensate fishers and others for losses or damages related to offshore oil and gas activity.**” (p. 360, *Strategic Environmental Assessment Sydney Basin and Orpheus Graben Offshore Cape Breton Nova Scotia*)

While the “processes and measures” referred to may be both comprehensive and generous, the real difficulty lies with establishing whether losses to the fishery can be legally attributed to oil drilling or exploratory work. This is very problematic. Oil and gas companies are financially and institutionally equipped to deal with legal issues in a way that the independent fishery simply is not. Legal, financial and time constraints on the fishing industry make this anything but a level playing field. The fishing industry simply cannot depend on blithe references to compensation whose likelihood of ever being paid out is vanishingly low. It would seem eminently reasonable and responsible on the part of CNSOPB, that previous to any permits for exploration

or development even being considered, a thorough review of the efficacy of compensation programs be conducted, in conjunction with industry organizations. Our fisheries are long established and we protect them through good management and sustainable fishing practices. We would expect CNSOPB to exhibit similar responsibility for the risks to those fisheries its actions might engender.

Respectfully Submitted,

Kevin Squires  
President, MFU Local 6

