



Newfoundland & Labrador Fisheries Communication Plan: Operations and Emergency Response

Newfoundland & Labrador Orphan Basin Exploration Drilling Program

November 2022

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Contents

1	Introduction.....	4
2	Scope and Objectives	4
3	Project Location.....	6
4	Commercial Fisheries Stakeholder Engagement.....	6
5	Communication During Operations	7
6	Communication in the Case of an Accident or Malfunction	8
7	Utilization of the Fisheries Liaison Officer & Fisheries Guide Vessels	8
8	Lost or Damaged Fishing Gear.....	9
9	References.....	9
10	Appendix A – Stakeholder Feedback.....	10

Foreword

This is the first issue of the Newfoundland and Labrador Fisheries Communication Plan. This document is newly created and is not based on existing documents.

This document supports BP Policy/BP Practice/BP Procedure.

1 Introduction

BP Canada Energy Group ULC (“bp”) is planning to conduct offshore exploration drilling activities within the areas of its existing offshore exploration licences (ELs) in the Orphan Basin approximately 343 to 496 kilometres (km) northeast of St. John’s, Newfoundland and Labrador. Water depths in these ELs range from approximately 970 to 3,000 metres (m). ELs 1145, 1146, 1148 in the West Orphan Basin are located within NAFO Unit Area 3Kg and Shrimp Fishing Area (SFA) 6. EL 1149 in the East Orphan Basin overlaps NAFO Unit Area 3Kk and 3Le and is located beyond the boundaries of Canada’s Exclusive Economic Zone (EEZ). The Newfoundland Orphan Basin Exploration Drilling Program (“the Project”) may involve drilling multiple wells between 2023 and 2026, with an initial well planned for Q2, 2023, in EL 1145, noted on the map in the Project Location Section 4.

In February 2020, bp was released from the Canadian Environmental Assessment Act (CEAA 2012) environmental assessment process, a process initiated in January 2018 to enable bp to conduct exploration drilling in the Orphan Basin located northeast of St. John’s, NL. That process culminated with the issuance, by the federal Minister of Environment and Climate Change, of a February 2020 Decision Statement, which contained several conditions that bp are required to address.

2 Scope and Objectives

As per Condition 5.1 of the Decision Statement, issued by the Minister of Environment and Climate Change under the Canadian Environmental Assessment Act 2012 (CEAA 2012) for the Project, and in recognition of fisheries stakeholders who may be conducting activities in or near bp’s ELs, bp has developed this Fisheries Communication Plan, in consultation with fisheries stakeholders, to provide a framework to facilitate effective communication during Project planning, drilling operations, and in the event of an emergency.

Through the implementation of the Fisheries Communication Plan, bp aims to:

- provide transparent, timely, and factual information about Project plans and activities
- provide a single point of contact (SPOC) to facilitate two-way communication
- encourage input from stakeholders to understand their needs, priorities, and concerns
- exchange information and identify mutual beneficial best practices and mitigation measures.

This Fisheries Communication Plan has been prepared in consideration of the One Ocean Protocols for *Consultation Meetings: Recommendations for the Fishing and Petroleum Industries in Newfoundland and Labrador* (One Ocean 2013), and *Exploratory Drilling Projects in the Newfoundland and Labrador Offshore* (One Ocean 2021), as well as meet the conditions set out in the February 2020 Decision Statement, which specify:

- Condition 5.1 - The Proponent shall develop and implement a Fisheries Communication Plan in consultation with the Board, Indigenous groups and commercial fishers. The Proponent shall develop the Fisheries Communication Plan prior to drilling and implement it for the duration of the drilling program. The Proponent shall include in the Fisheries Communication Plan:
 - Condition 5.1.1 - procedures to notify Indigenous groups and commercial fishers of planned drilling activity, a minimum of two weeks prior to the start of drilling of each well;
 - Condition 5.1.2 - procedures to determine the requirement for a Fisheries Liaison Officer and/or fisheries guide vessel during drilling installation movement and geophysical programs;
 - Condition 5.1.3 - procedures to communicate with Indigenous groups and commercial fishers, in the event of an accident or malfunction, the results of the monitoring and any associated potential health risks referred to in condition 6.10;
 - Condition 5.1.4 - procedures to engage in two-way communication with Indigenous groups and commercial fishers in the event of a spill requiring a tier 2 or tier 3 spill response over the duration of the spill response;
 - Condition 5.1.5 - the type of information that will be communicated to Indigenous groups and commercial fishers, and the timing of distribution of this information, that will include but not be limited to:
 - 5.1.5.1 - a description of planned Designated Project activities;
 - 5.1.5.2 - location(s) of safety exclusion zones;
 - 5.1.5.3 - anticipated vessel traffic schedule;
 - 5.1.5.4 - anticipated vessel routes; and
 - 5.1.5.5 - locations of suspended or abandoned wellheads.

3 Project Location

The Project area for the 2023 exploration drilling program is in the Orphan Basin in EL 1145 noted in Figure 1.

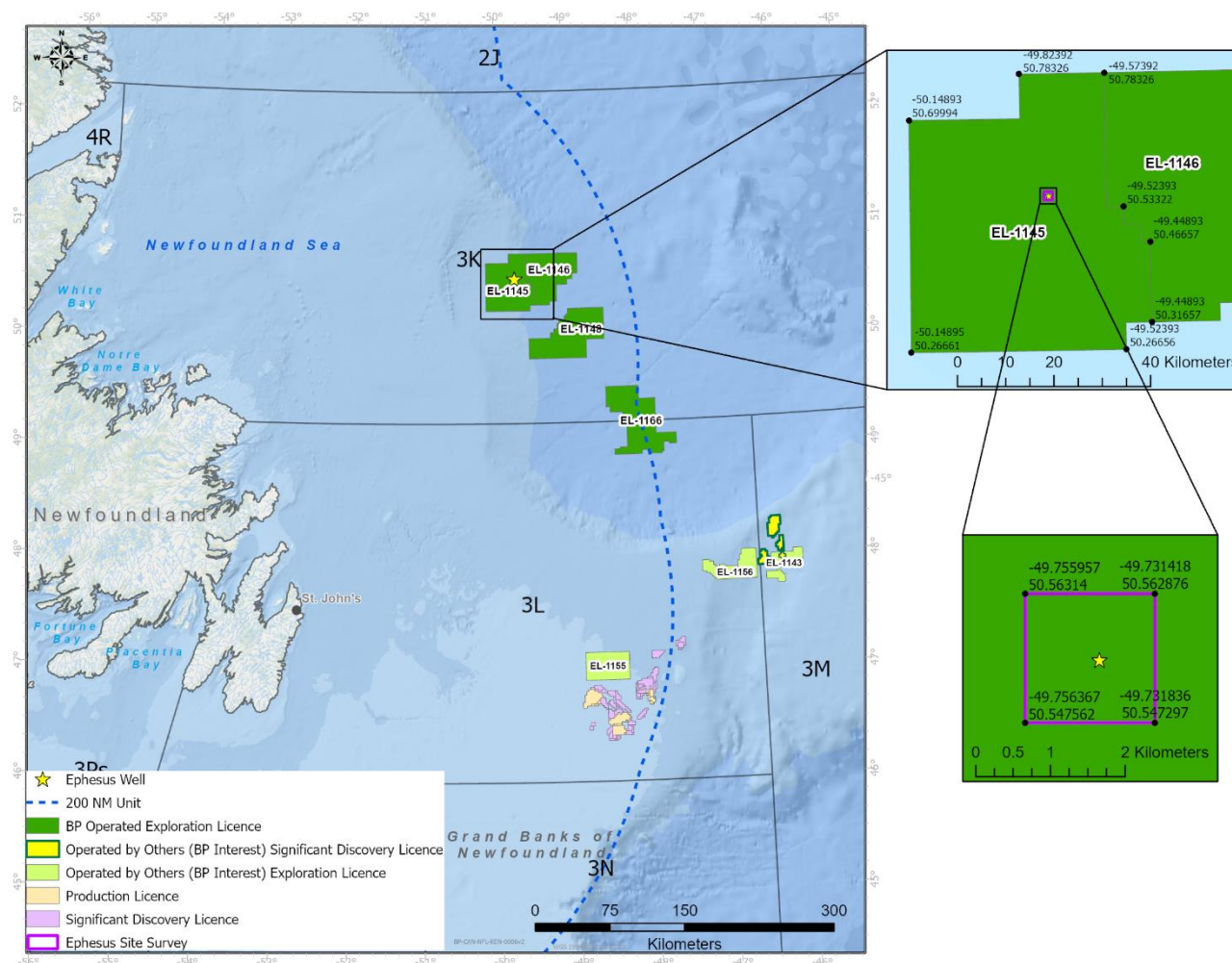


Figure 1: Project Location

4 Commercial Fisheries Stakeholder Engagement

Commercial fishing is a significant industry in the province of Newfoundland and Labrador, and its members are key stakeholders for the Project. Commercial fishing entities are represented by:

- Fish, Food and Allied Workers (FFAW) Union
- Association of Seafood Producers
- Ocean Choice International
- Atlantic Groundfish Council
- Canadian Association of Prawn Producers

bp has ongoing communication and engagement with the fishing industry to exchange information and enhance mutual awareness of operational activities in the offshore. bp is, and will continue to, engage directly with stakeholders through all phases of project planning

and operations. bp will also continue to communicate with One Ocean, a liaison organization established by and for the fishing and petroleum industries in Newfoundland and Labrador, of which the fisheries stakeholders are a member. bp maintains a database of contact information for the above stakeholders. In addition to newsletters and other communications provided to various stakeholder groups, the point of contact for each group will receive operational and emergency response communications as outlined in this Plan.

bp's Stakeholder and Indigenous Relations Advisor will be the single point of contact to serve as the liaison with the fishing industry and to receive requests for information and/or meetings from fisheries stakeholders.

5 Communication During Operations

Beginning at a minimum of two months prior to planned exploration drilling operations, two weeks prior to the commencement of drilling, and throughout the exploration drilling program for each approved well, bp will provide fisheries stakeholder contacts with emailed updates on operational activities (see list of operational activities below). The operational updates will be sent to the main point of contact provided by fisheries stakeholder groups who will be responsible for any further dissemination of the information within their own organization.

bp will provide monthly (or sooner for time sensitive information) e-mail operational updates that contain the following information:

- Map of rig location (coordinates, NAFO Divisions)
- Mobilization of the rig, rig name, and pictures
- Safety zone – description, location and purpose
- Supply and safety vessels / identification / call signs / routes
- Anticipated vessel traffic schedule
- Commencement of exploration drilling (spud)
- Schedule of activities (e.g., BOP installation, Vertical Seismic Profiling)
- Abandonment of well
- Demobilization/rig movement
- Conclusion of drilling
- Links to documents and reports: (e.g., CNLOPB website, bp website)
- Contact information for bp

When available, bp will publish to its website (www.bp.com/canada) the following reports:

- Annual report and executive summary (Closure Report)
- Seabed investigation survey results
- Indigenous and Commercial Fisheries Communication Plans
- Well and Wellhead Abandonment Plan
- Well control strategies
- Spill Response Plan
- Spill Impact Mitigation Assessment

- Project Implementation Schedule
- Monitoring and follow-up results of environmental monitoring programs related to birds, marine mammals, fish and fish habitat.

Operational details will also be provided to marine communications and traffic services for broadcasting and publishing in the National Navigational Warning (NAVWARN) of the NAFO Secretariat. Fisheries and Oceans Canada will also be notified prior to project commencement to avoid any potential conflict with any research surveys being completed in the drilling areas.

6 Communication in the Case of an Accident or Malfunction

bp will develop a Spill Response Plan in consultation with the fisheries stakeholders. A draft of the plan will be provided to stakeholders for review and comment prior to the start of the drilling program. bp will conduct an exercise of the Spill Response Plan and provide the results to stakeholders.

In the case of an accident or malfunction that may result in adverse environmental effects, bp will initiate the following communications in accordance with its Incident Management Plan:

1. Within 48 hours of the incident or spill, notify by telephone, the representatives identified by interested fisheries stakeholder groups.
2. Following initial contact described above, bp will, via email, provide an Emergency Information Update Bulletin twice weekly in the initial phases of the incident, and then as operations and other activities resume, updates will be sent as new information becomes available to fisheries stakeholder contacts.

Information to be included in the Emergency Information Update Bulletin (when available):

- Situational/event overview
- Location of event
- Timing of event
- Actions currently underway
- Any known restrictions or health, safety or environment considerations
- Impacts to fisheries
- Results of monitoring programs
- Next scheduled update
- Contact information for bp

7 Utilization of the Fisheries Liaison Officer & Fisheries Guide Vessels

One Ocean's *Risk Management Matrix Guidelines for the Utilization of Fisheries Liaison Officers and Fisheries Guide Vessels for the Fishing and Petroleum Industries of Newfoundland and Labrador* will be used to determine the need for a Fisheries Liaison Officer (FLO) and/or Fisheries Guide Vessel (FGV) during rig mobilization (Figure 2). The One Ocean Matrix includes the provision of FLOs and offers considerations for the use of FGVs.

FGVs may be deployed for transit and tow operations to support bp’s scout vessel in monitoring and safeguarding fishing activity and gear. bp will utilize the Risk Management Matrix Guidelines to assess if a FLO and/or FGV will be used for the Project. The matrix can be found at [Matrix \(oneocean.ca\)](http://Matrix.oneocean.ca).

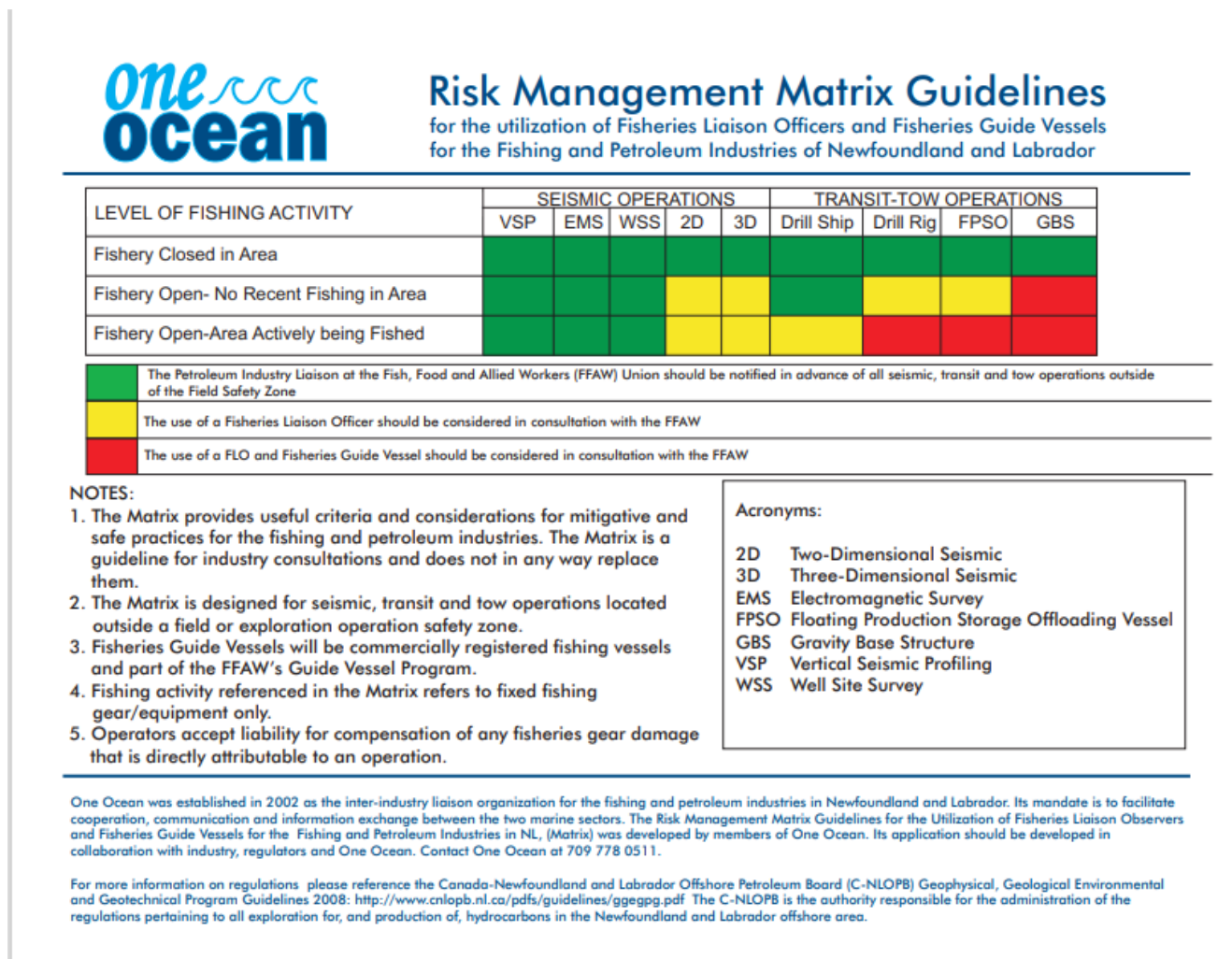


Figure 2: One Ocean Risk Management Matrix Guidelines

8 Lost or Damaged Fishing Gear

bp will follow the Canada-Newfoundland and Labrador Offshore Petroleum Board’s (C-NLOPB) *Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activity* (C-NLOPB 2017) for lost or damaged fishing gear. bp will develop a Fisheries Compensation Program for any fishing enterprise that incurs an actual loss attributed to bp operations. Enterprise owners can complete and submit the form available on bp’s website (bp.com/canada). bp will also report annually to the C-NLOPB on any known incidents of lost or damaged fishing gear attributed to Project activities.

9 References

BP (2018) – BP Canada Energy Group ULC Newfoundland Orphan Basin Exploration Drilling Program Environmental Impact Statement.

Environment and Climate Change Canada (2019) - Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012 for the Newfoundland Orphan Basin Exploration Drilling Project

One Ocean (2010) - One Ocean Risk Management Matrix Guidelines. Available online at <http://www.oneocean.ca/pdf/Matrix.pdf>

One Ocean (2013) - Protocol for Consultation Meetings: Recommendations for the Fishing and Petroleum Industries in Newfoundland and Labrador

One Ocean (2021) – Communication Protocol for Exploratory Drilling Projects in the Newfoundland and Labrador Offshore

One Ocean (2022) – One Ocean Oil Spill Communication Protocol

C-NLOPB (2017) - Compensation Guidelines Respecting Damages Relating to Offshore Petroleum Activity

10 Appendix A – Stakeholder Feedback

Stakeholder Groups	Engagement Activity	Feedback
FFAW, Atlantic Groundfish Council, Ocean Choice International, Association of Seafood Producers, Canadian Association of Prawn Producers	Draft Fisheries Communication Plan emailed to stakeholders with a request for feedback	One group acknowledged receipt of the Plan and had a question regarding seismic vessels during drilling. bp provided clarification that there are no plans for seismic vessels during drilling.