



FISH, FOOD AND
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Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
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Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the opportunity to comment on the Environmental Assessment of the Ptarmigan Geophysical Program for Offshore Western Newfoundland, 2012-2021. I would like to comment on a few aspects of replies from the proponent on behalf of the fishing industry, namely the members of the FFAW/CAW.

It is disconcerting that there was such great discrepancy between the coverage of area listed in the initial document. Especially in the context of what was provided during the meetings which took place subsequent to development of the initial report. It does be the question if the proponent was prepared to go through consultations without defined area coverage.

By virtue of Figure 2-4 which has been provided with the proponents responses to comments on the initial report, it is indicated that the proponent will only be shooting on lines in the approximate directions of Northeast and Southwest. If the intention to shoot any kind of grid formation there needs to be a buffer provided for the turning of the vessel

In the context of the Fisheries Liaison Officer, the response that the FLO will be present on one of the two vessels is not adequate for the FFAW/CAW. Standard procedures in all seismic operations under the mandate of the Canada-Newfoundland and Labrador Offshore Petroleum Board is that the FLO is onboard the seismic vessel. The FFAW strongly advises against moving away from this standard operating procedures in seismic programs. This response applies to responses on comments 39 and 61 in particular. If the proponent feels a need to have an FLO on the pilot or chase vessel, this has to be in addition to the FLO on the seismic vessel.

The FFAW/CAW is glad to see that the proponent has taken into consideration the comments made during the consultation process. Pursuing the seismic activity in the window between mid-July and end of August would significantly diminish the possibility of interaction and interference between the two industries.

I thank you for providing an opportunity for the FFAW/CAW to review the proponent replies to comments on this EA. If you have any questions or comments please feel free to contact me.

Kind regards,

Jóhan Símun Joensen
Petroleum Industry Liaison