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FISH, FOOD AND  
ALLIED WORKERS

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Thursday, February 28, 2013

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5th Floor, TD Place  
St. John's, NL A1C 6H6

Mr. Hicks,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the ARKeX Ltd. **North Flemish Pass Gravity Gradient Survey**. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

The FFAW wants to indicate that it has expertise to engage in the Environmental Assessment process. The contact within the FFAW would be the Petroleum Industry Liaison (Johan Joensen, [jjoensen@ffaw.net](mailto:jjoensen@ffaw.net)), who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultation processes and also experienced knowledge of the marine environment in which the petroleum industry is currently operating.

The Project Description for the proposed program is relatively limited, but this is to be seen in the light of the passive nature of the activity. The FFAW would have liked to have seen an approximate of the line kilometres associated with this project, as is customary with other programs. Further to this the FFAW would also have liked to seen an indication of the intent to using a Fisheries Liaison Officer, especially as the timing of the proposed activity is the same as that of the fisheries pursued by most of the members of the union.

In the Project Description developed by ARKeX there is no indication that they expect to use Marine Mammal Observer/ Fisheries Liaison Officer. The use of such expertise is required under the Canada-Newfoundland & Labrador Offshore Petroleum Board, as prescribed on page 47 of the Canada-Newfoundland & Labrador Offshore Petroleum *Boards Geophysical, Geological, Environmental and Geotechnical Program Guidelines* – as per January 2012. It would be in the interest of the membership of the FFAW that a Fisheries Guide Vessel be used when pursuing Geophysical, Geological, Environmental and Geotechnical Programs – especially in heavily fished areas.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is of importance as parts of this program will have activity close to and within various fishing areas. The Petroleum Industry Liaison with the FFAW is available to assist in arranging

consultation sessions specifically aimed at those active within the fishing industry. The FFAW is looking forward to seeing the completed Environmental Assessment for this proposed activity.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison