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Tuesday, January 21, 2014

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> 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. and THS-NOPEC Geophysical Company ASA **Labrador Sea Gravity Gradient Survey 2014-2018**. 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 the expertise to engage in the Environmental Assessment process. The lead contact within the FFAW would be the Petroleum Industry Liaison ([REDACTED]), 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.

Having reviewed the Scoping Document and the Project Description, the FFAW has the following quick observations:

- Page 4 of Project Description: Suggests that the program may start as early as April 1<sup>st</sup>, 2013 – which is an impossibility.
- Page 10 of Project Description: There is no qualification on the length of the cable being towed or at what depth of water it would be towed. This is important information with giving consideration to mitigation efforts.
- Page 13 of Project Description: This is not the first time that a proponent almost uses threatening language, stating that the alternative is to forego exploration in the Labrador Sea and pursue opportunities elsewhere. This is effectively always the fact and is an unsubstantial statement in the context of particular projects.
- When it comes to the temporal scope of the work being proposed, the FFAW emphasises the importance of avoiding the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab and this needs to be specifically listed in the Scoping Document. This would entail avoidance until the stations have been completed. In light of the lack of specifications relating to the cable the FFAW feels it worthwhile to mention this.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. The Petroleum Industry Liaison with the FFAW is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

[REDACTED]

Petroleum Industry Liaison