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Mr. Hicks

The Fish, Food and Allied Workers Union (FFAW-Unifor) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the ExxonMobil Canada Ltd. **Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Programs, 2015-24**. FFAW-Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

FFAW-Unifor wants to indicate that It has the expertise to engage in the Environmental Assessment process. The lead contact within FFAW-Unifor would be the Petroleum Industry Liaison (Jóhan Joensen), 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, FFAW-Unifor has the following quick observations:

- The Project Area is of such a size that it covers a multitude of harvesting activities throughout a calendar year, this includes the sensitive life cycles of the species found in this area.
- FFAW-Unifor would like to emphasise that the crew on the vessels engaged in these programs have to be well informed on the operational procedures in Canadian (Newfoundland and Labrador) waters.
- When it comes to the temporal scope of the work being proposed, FFAW-Unifor 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.
- 4.2 of the Scoping Document could include qualification of any change or impact that the project could have on existing commercial activities in the area.
- FFAW-Unifor would strongly suggest that the Fisheries Liaison Officer be used for the communication with fishing vessel and this duty not be put on the standby/guard vessel as suggested on page 6 of Project Description.

- In the context of consultation page 8 of the Project Description suggests that “ExxonMobil will meet as necessary ...”. Consultation with concerned stakeholders should happen as a matter of fact and not just as necessary.
- It is worth noting that as there are several activities listed as possible undertakings in relation to this Environmental Process that providing a seasonal temporal scope would be increasingly difficult.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program will have the seismic vessel operating within very active harvesting areas. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

Jóhan Joensen
