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**KEITH SULLIVAN**  
*President*

**DAVID DECKER**  
*Secretary-Treasurer*

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Monday, March 14, 2016

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

**Re: ExxonMobil Canada Ltd. Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Program, 2015 to 2024**

Dear Darren,

Thank you for providing the Fish, Food and Allied Workers (FFAW | UNIFOR) with the opportunity to comment on the Addendum and Amendment for ExxonMobil Canada Ltd's Eastern Newfoundland Offshore Geophysical, Geochemical, Environmental and Geotechnical Program, 2015 to 2024.

The proposed expansion does not raise concerns outside of those that have been raised with the original project area. Continued communication and consultation is critical.

While addressed in the comments, we would like to reiterate the importance of continued consultation and communication throughout the time frame of this project, and stress the importance of consultation during the first quarter. While comments have been acknowledged and consultation is referred to throughout the document, this suggested commitment for consultation during the first quarter of the year has not been agreed to explicitly.

**5.10.2 Environmental Effects Assessment Page 296:** as the effects of seismic sound on commercial species has not been concretely agreed upon and the literature is conflicting, we do not agree with ExxonMobil's response that,

"The EA Study Team does not consider, for example, that the presence of seismic sound energy in the marine environment and any associated (localized and short term) implications for individual fish behaviours as a result of the Project is likely to have a negative effect upon up to 5 percent (and certainly, not up to 25 percent) of the fishers within the Study Area, and especially, that it will result in a significant effect on marine fisheries, which was defined in the EA as "a detectable reduction in the overall economic returns generated from fisheries or other commercial activities within the Study Area over one or more years" (Section 5.4)."

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**FFAW | UNIFOR**  
Fish, Food & Allied Workers

PO Box 10, Station C  
368 Hamilton Avenue, 2nd Floor  
St. John's NL A1C 5H5

Tel: 709.576.7276  
Fax: 709.576.1962  
Web: [www.ffaw.nf.ca](http://www.ffaw.nf.ca)

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I would like to thank you for the opportunity to provide input on this Addendum and Amendment.  
Please do not hesitate to contact me at any time if you require further information.

Sincerely,

Dwan Street

Projects Coordinator

FFAW|UNIFOR

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