



FISH, FOOD AND
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Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
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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 GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey, Labrador Shelf 2013-2015: Commencement on Environmental Assessment. 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), 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.

Under heading number 10 on page 7 there is a sentence that reads "..., it is would not be expected to interact with ...". This sentence is confusing, as there is either an expectation or there is not?

In the Project Description developed by GX Technology it is indicated 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* – per January 2012. Further it is indicated in the Project Description that the intention is only to have one vessel in addition to the seismic vessel. Common practice is to have one vessel together with the seismic vessel at all times. It is especially important that there is a vessel with the seismic vessel when in heavily fished areas – for these locations it should be a Fisheries Guide Vessel.

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 close to and within various 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.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison