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FISH, FOOD AND  
ALLIED WORKERS

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PRESIDENT

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DAVID DECKER  
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Friday, June 14, 2013

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5th Floor, TD Place  
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Mr. Hicks,

Having reviewed to responses to comments provided by the Hebron Project, regarding the CSR Addendum the Fish, Food and Allied Workers Union (FFAW) has the following observations.

ExxonMobil Canada Properties (EMCP) should be well aware that there were significant faults with the 2013 Environmental Assessment Update, in effect it was these faults that caused the current addendum being discussed. It is from the 2013 EA Update that EMCP showed its failure to adhere to what was submitted in the original Comprehensive Study Report (CSR).

By suggesting that everything stated in the CSR is the conclusive evidence with regards to the impact of exposing aquatic species to sound pressure is not a strong argument to have. As stated in the FFAW comments to the addendum, there are repeated observations by harvesters that there is a change to catch rates and distribution with seismic activity.

In the context of the mitigation efforts identified, harvesters stated that there would be a need for the seismic vessel to turn to the west when on the north end of acquiring lines, so as to avoid harvesting. In the Addendum what is stated was that this would be done when feasible. The question in this is then who is to determine what is feasible, and what feasibility is taken into consideration.

With regards to the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, the FFAW would suggest that the information provided in the personal communication is inaccurate, as none of the scientific licenses were issued until September 1<sup>st</sup>, 2012.

The FFAW would stand by all the comments made in the submission regarding the Hebron Project Addendum. This would include the comment relating to the importance of giving consideration of the ongoing process of having a Strategic Environmental Assessment done for Eastern Newfoundland.

Yours truly,

Jóhan Joensen  
Petroleum Industry Liaison