



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 Hibernia Management and Development Company Seismic Program for the Hibernia Oil and Gas Production Field 2013-end of life of the field: 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, [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.

The document and its title indicate that this is an Environmental Assessment for a Seismic Program with no time horizon presented, other than the end of production from the Hibernia oil field. This is not a tenable description for the FFAW, as there can be significant changes within relatively short time horizons both within the fishing industry and also within the petroleum industry. For the fishing industry there are indicators of changes in the resource composition, with a move back towards greater groundfish abundance. In light of this it is important for the FFAW that the horizon for the general overview for fishing activity goes back to before the moratoria on Cod and other groundfish species, to provide an indication of the areas where this activity would take place.

The Scoping Document states in 5.1.2 that the Environmental Assessment should have a temporal scope describing the timing of project activities. It would be more appropriate for the Hibernia Management and Development Company to adjust their Project Description to present what is proposed for the immediate future. The FFAW is not comfortable with an approval of the project as described in the Scoping Document and Project Description.

Further looking at the Project Description, 1.7.5 indicates that the Fisheries Liaison Officer will be on the Seismic Vessel; 1.7.4 indicates that a standby or picket vessel will be used for interaction and

communicating with other users and working with fishers; and finally 1.6 makes mention of the Fisheries Liaison Officer, but not much on his location in the operation.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison