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Friday, April 10, 2015

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

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 MG3 (Survey) UK Limited Offshore Labrador Geochemical and Seabed Sampling Program 2015-2024. 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:

- There is a disconnect between the Project and Study Areas. There are references about doing work in Labrador to the Orphan Basin, then there are references to the Flemish Cap and Pass both of which suggest that work will be done further southeast than to the Orphan Basin.
- There is no direct mention about covering Fisheries Science work being done by industry and governments.
- As a point of interest, where within the Study Area is it only 10m deep.

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 petroleum exploration vessel operating close to and within areas of varied activities. 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
Petroleum Industry Liaison

