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Friday, February 27, 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 "Amendment to the Environmental Assessment of MKI's Northeast Newfoundland Slope Seismic Program, 2012-2017". 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 (NL).

The commercial fishery is very important to the many rural communities in NL. Members of FFAW-Unifor live in communities and rely on the resources covered by the spatial boundaries of this program.

There are a few items in the document that FFAW-Unifor would like to comment on:

- There is not specific mention and consideration of mitigations for fisheries sciences apparent in this Amendment submission.
- 3-D Seismic activity does have a greater challenge of mitigation and intensity of exposure, yet there is no mention of this being fully re-evaluated in the considerations for the Valued Environmental Components.

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 has seismic vessels operating within active harvesting areas. The Petroleum Industry Liaison with FFAW|Unifor is available to assist in arranging consultation session specifically aimed at those active within the fishing industry.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison