



KEITH SULLIVAN
President

DAVID DECKER
Secretary-Treasurer

Thursday, December 21, 2017

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

Re: Environmental Assessment of Multiklient Invest Newfoundland and Labrador Offshore Seismic Program, 2017-2026 Addendum

Dear Mr. Hicks,

Please accept the Fish, Food and Allied Workers' Union (FFAW/Unifor) comments on the Addendum to the Environmental Assessment of Multiklient Invest's Newfoundland and Labrador Offshore Seismic Program, 2017-2026.

It is unclear how the proponent's responses regarding acknowledgement to the assessment of cumulative effects regarding seismic activity (page 6) and the anticipated increased reliance on groundfish catches in the near future (page 8) will be included within the addendum of the Environmental Assessment. We ask that this be clarified.

As well, it is unclear how the comment regarding DFO not indicating an official spatial and/or temporal buffer mitigation for seismic operations (page 10) be represented in the Environmental Assessment. Will the previous comment (7day/30 km) be removed from the document?

The response regarding Compensation Guidelines is vague (page 10). Does the proponent engage a response organization during seismic activity? Does the proponent have a proactive plan in place to ensure fair and compensation to affected parties for attributable damages in the event of any loss or damage arising from a spill or debris or the incurrence of expenses by taking remedial action in relation to a spill?

If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee
Petroleum Industry Liaison
