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Thursday, March 27, 2014

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Mr. Hicks,

Fish, Food & Allied Workers (FFAW|Unifor) would like to respectfully submit the following comments in connection with **Multi Klient Invest AS (MKI) Offshore Labrador Area 2D/3D Seismic Program, 2014-2018, Environmental Assessment**. The FFAW|Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland & Labrador. While the FFAW|Unifor is generally supportive of proposed projects helping to stimulate the provincial economy, we must balance that support with the responsibility to protect the interests of our members, fish harvesters and plant workers, and the health of the ocean for the future generations.

The commercial fishery is very important to the many rural communities in Newfoundland & Labrador. While the membership of the FFAW|Unifor live in communities as far north as Fish Cove Point (just north of Cartwright), our Labrador members fish in NAFO divisions 2G, 2H, 2J and 3K for crab, shrimp, turbot, cod, etc. As well, our harvesters in 4R (northern Newfoundland) have rights to fish in 2J, and our northeast coast fishers still have fishing rights of the coast of Labrador as well. We also have members who fish quotas for the Natuashish Government in 2H.

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

- Page 31: In recent commentary from the DFO, it has been indicated that there is greater confidence in the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab than there is in the Trawl Surveys.
- Page 36: Separately identified cod stocks in Newfoundland and Labrador are also found in 3Ps, 3Pn and 4RS. In light of the discussion already including stocks that are outside the purview of the project area, all others should be included.
- Page 48: In the context of the changing composition of the commercially harvested species, it is worth to note how there have been changes to the environmental regime that impacts the species composition – independent of the harvesting activity.
- Page 56, Harvest Timing: It is worth noting that consideration should be given to the fact that weather and ice conditions impact the timing of harvesting activity.
- Page 56 Northern Shrimp (and all subsequent fisheries discussions): There is no specific rationale given for only using May-November data. Northern Shrimp is harvested in the area 12 months of the year, be it by inshore vessels or offshore factory freezer trawlers.

- Page 89: There is no qualifier for what measurement is used for the “Mean Catch Depth Range”.
- Page 90: By the wording of the last paragraph it appears that the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab is a relatively new undertaking – “...past few years, such ...”. The truth is that this is a long standing survey that has been conducted for more than 10 years.
- Page 216: Although the last paragraph on the page may hold true historically, in recent years there has been an increase in the Seismic Programs operating in Newfoundland & Labrador waters in a given year.
- A1-9: In the context of stakeholder groups FFAW|Unifor and One Ocean – John Christian is not a contact for either of these organizations, rather he was in as a consultant for the proponent.

There is an item on utilizing a 7 day temporal pre-research survey separation that comes up in several places in the document (i.e. pgs. 156, 184). It is the understanding of FFAW|Unifor that this is being accepted by DFO when it comes to their Research Vessel Trawl Surveys, but it is not feasible to be utilized in connection with the execution of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab. If there are further questions on these matters it would be worthwhile to communicate with the shell-fish research scientists at DFO. The reviewer is only aware of the implementation of spatial separation having been discussed in the context of any recent programs in Newfoundland & Labrador. The FFAW|Unifor is obliged to again state that any impact on either harvesting of fisheries science should be recognized as unacceptable in the Newfoundland & Labrador waters.

The FFAW|Unifor and all the affected fish harvesters and plant workers are eager to work collaboratively with MKI to ensure that everyone shares the prosperity hoped to be created from seismic and harvesting activities. I thank you for providing an opportunity for the FFAW|Unifor to comment on the **Multi Klient Invest AS (MKI) Offshore Labrador Area 2D/3D Seismic Program, 2014-2018, Environmental Assessment**. If you have any questions or comments please feel free to contact me.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison