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Darren Hicks
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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 for the Draft Scoping Document and Draft Project Description for Multi Klient Invest AS (MKI) Labrador Sea Seismic Program, 2014-18 Environmental Assessment process. 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, 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.

Looking at the letter from the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) to One Ocean and the FFAW dated November 5th, 2013, there is apparent confusion. The first paragraph references the company MKI, meanwhile the second paragraph suggests that the company in question for this Environmental Assessment is Suncor.

The Scoping Document suggests that it has been developed in consultation with a number of Provincial and Federal Government Departments together with other agencies. However, to the FFAW's best information some of the listed government departments are not involved in the development of the Scoping Documents other than for a review at the same time as organizations such as One Ocean and the FFAW.

The FFAW would see it as worthwhile to ensure that avoidance of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab is specifically listed in the Scoping Document. Seismic activity should avoid the stations of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab until all stations have been completed.

The introduction of the Project Description suggests that there is a possibility that the company would conduct a 3D Seismic Survey in any of the years 2014-18. However, the Scoping Document and later text in the Project Description clearly indicates that the activity in 2014 will be contained to a 2D Seismic Survey of a 90 days in duration.

In section 2.2.1 of the Project Description the seismic company suggests that there is not enough seismic information for the area to serve the needs of energy companies. There has been considerable seismic activity in Newfoundland and Labrador waters over the years. It would be pertinent for the C-NLOPB to go through an exercise of ensuring that seismic programs being proposed are not duplicating efforts already having taken place. It is a problem if there is no willingness to use the various data sets that are available from previous seismic programs. It should be pertinent for the C-NLOPB and energy companies to clearly identify that there is data lacking in the existing data sets. Continued and consistent exposure of the marine environment to seismic activity is a concern for other ocean users due to the possibility of unknown long-term impacts.

The FFAW will continue to be available to the proponent and the C-NLOPB for further consultations and questions as they come up.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison