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Friday, May 23, 2014

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,

Fish, Food & Allied Workers (FFAW|Unifor) would like to respectfully submit the following comments on the responses in connection with **Multi Klient Invest AS (MKI) Offshore Labrador Area 2D/3D Seismic Program, 2014-2018, Environmental Assessment Addendum**. 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.

Response: "MKI commits to maintain ..."

FFAW Reply: As per Appendix 2 of the Geophysical, Geological, Environmental and Geotechnical Program Guidelines of the C-NLOPB proponent should stay away from active fishing areas and fisheries science work to mitigate any negative impacts. The comments provided by the FFAW|Unifor are to address the uncertainties and implement the precautionary approach of influence on the fisheries and fisheries science. It is evident in the responses from the DFO Research Scientist that such precautions are warranted due to the "speculative nature of possible effects of seismic activity on snow crab".

Response: Section 4.3.3.1

FFAW Reply: The nature of the comment provide by the reviewer was in fact to establish that the reverse of what is being explained happened in the 1990s is happening now.

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