



**FISH, FOOD AND
ALLIED WORKERS**

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Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
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Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the proponent's response to comments on the MKI 2D seismic program EA Addendum. While we are mostly satisfied with MKI's responses to our concerns past seismic program events suggest that fishing industry considerations are secondary to oil and gas exploration activities. Therefore, we would like to reiterate our position on the matter.

The schedule for this seismic program coincides with the prosecution of the commercial fishery in the Labrador Sea. The fishing industry has a narrow window of opportunity to fish allocated quotas. Recent seismic programs have asked our fish harvesters to stop fishing in an area to allow a seismic vessel, conducting another seismic program, to pass through. This was totally unacceptable to our members as seismic exploration programs should not be conducted to the detriment of the fishing industry.

To mitigate conflicts, seismic programs should be conducted in areas or seasons that avoid commercial fishing. As this is not the case, communication on the water by a Fisheries Liaison Officer (FLO), situated onboard the seismic vessel, is crucial to minimize interference with fishing activities. This is in keeping with the C-NLOPB's *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (February 2011).

A condition of the proponent's authorization to conduct a seismic program in Canadian waters should be that there is no impact to commercial fishing activities. The seismic ship should only be able to pass through an area if there is no fishing activity ongoing in the vicinity, it does not impede commercial fishing and it can pass through an area without incident.

The fishery is of strong cultural and socio-economic importance to the people of Newfoundland and Labrador. Our intention is not to prevent oil and gas exploration in our waters but to ensure that both fishing and petroleum industries co-exist with minimal disruption to both industries.

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

Kind regards,

Robyn Saunders Lee
Petroleum Industry Liaison