

FISH, FOOD AND  
ALLIED WORKERS

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DAVID DECKER  
SECRETARY-TREASURER

July 29, 2011

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 4th Floor  
St. John's, NL A1C 6H6

Dear Darren,

Thank you for providing the Fish, Food and Allied Workers' Union (FFAW/CAW) with the opportunity to comment on the Addendum to the Environmental Impact Assessment for Multi Klient Invest's Labrador Program, 2011-2013.

The Addendum provides a better summary of the commercial fishery in the study area. The more recent time series of harvesting location maps by month with NAFO Divisions are clear and show the level of activity of crab, shrimp and turbot fishing in the company's area of interest.

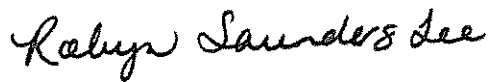
Following review of the Addendum I would like to make a few clarifications/suggested edits:

- There are still three noted references to a five year time frame for the project (pages 9, 34 and 213).
- Fisheries regulations to reduce by-catch while trawling for shrimp are in effect in all Shrimp Fishing Areas (SFAs) in the Newfoundland and Labrador region (page 113).
- Otter trawling (shrimp fishing) and the use of nets are activities prohibited in the closed area of the Hawke Channel. Pot (crab) fishing however is allowed in this closed area (page 113).
- The opening and closing dates of fisheries is variable from year to year. This year the crab fishery in 3K will close towards the end of July. The fisheries maps for crab harvesting in 3K from 2005 to 2009 also show substantial activity in the northern portion of 3K in the month of July. In terms of more accurately describing fishing activity the reference to the crab fishing season should therefore read "...in 3K from April to the end of July" (page 134).
- Each vessel prosecuting the turbot fishery may have between 150 and 400 gill nets set in the water (page 146) depending on fishing area and season. Each net is 50 fathoms in length and nets are usually strung in sets of 50. Therefore a set of gill nets could extend three miles.
- The comment that vessels must give way to the seismic ship due to its limited manoeuvrability (page 204) is noted. Fishing vessels engaged in fishing activities however are also restricted in their ability to manoeuvre. Clear communication on the water is critical to ensure safety.

- The CEF, 2002 reference discussing seismic work conducted on the west coast is not found in section nine (References) of the report. Furthermore, the comment/reference is contrary to reports from fishermen on the west coast regarding the impacts of seismic programs on catch rates from later programs conducted in the last ten years (page 206).
- The notes from the FFAW/One Ocean meeting with the consultant hired to engage with stakeholders to outline the seismic project are not contained in Appendix B. Only meeting notes from April 2011 appear in this section. These notes were included in the original EA submission.

I thank you for providing an opportunity for the FFAW/CAW to comment on the Multi Klient Invest Labrador program Environmental Assessment Addendum document. If you have any questions or comments please feel free to contact me.

Kind regards,

A handwritten signature in black ink that reads "Robyn Saunders Lee". The signature is written in a cursive, flowing style.

Robyn Saunders Lee  
Petroleum Industry Liaison