

---

EARLE McCURDY  
*President*

DAVID DECKER  
*Secretary-Treasurer*

---

Monday, April 28, 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 in connection with **Multi Klient Invest AS (MKI) & TGS-NOPEC Geophysical Company ASA (TGS) Southern Grand Banks 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 members fish in NAFO divisions 3LNOPs for variety of species.

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

- Page 7: Spelling: on board vs. onboard, there is a lack of consistency in the language use.
- Page 9: 2.2.6.2 The FLO should lead the communications with fishing vessels in the vicinity of the Seismic Program, not the master of the support vessel.
- Page 28: Last line on the page suggests "cod air and sea temperatures ..." correct spelling please.
- Page 43: There is an introduction of CW without any explanation of what this is. Although the reviewer is aware of this notion, as this is a public document any abbreviations have to be explained.
- Page 43: "due to a recent warm oceanic regime" would be better and more accurate to read "due to a warming oceanographic regime".
- Page 47: Atlantic Cod section has no mention or discussion of 3Ps Cod, which is an independent stock within the Study Area. It is a significant point that the Cod in 3Ps is not mentioned, especially as this is a stock being harvested year round.
- Page 48: There is clear evidence within academic and governmental stock research that there have been strong signs of improvements to the abundance of cod.

- Page 50: In the discussion of Clam it is worth noting that the entire quota is held by a single company in Nova Scotia.
- Page 54: Unit Area (UA) is first define here, but is also used in long form on page 44. The UA short form is used several times before being define on page 54. For document consistency, introduce the short form at first use in document and then follow through with it.
- Page 55: The reviewer would like to know if all of the groups listed actively engaged in the consultations, or is this a list of who was contacted by the component.
- Page 56-7: 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 86: There is no qualifier for what measurement is used for the “Mean Catch Depth Range”.
- Page 87: There appears to be a diminishing of the importance of the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab, it is a survey that has been ongoing for over a decade using conventional commercial equipment.
- Page 154: 5.6.3.1 First six words should be deleted so that it reads “MKI will avoid active fishing areas ...”
- Page 181: 5.8.5.1 Avoidance needs to mention Cod as it is a rebounding stock that is harvested in 3Ps (in the Study Area) year round.
- Page 185: Under Avoidance any direct mention of “fixed gear” should be removed, as all active fishing grounds have to be avoided.
- Page 186: The locations of the Industry-DFO Post-Season Trap Survey for Snow Crab have been fixed for the past decade.
- Page 218: Looking at Figure 5.4 it would be appear to have been pertinent to include the shipping lanes for Terra Nova and White Rose petroleum production also.
- Page 220: First paragraph may hold true historically, but in recent years there has been an increase in the Seismic Programs operating in Newfoundland and Labrador waters in a given year. Third paragraph warrants mention of the proposed Southern Grand Banks Seismic Program proposed by GXT.
- Page A1-1: It is factually impossible that the Azores are in any way considered to be west of Newfoundland and Labrador.
- Page A1-2: In the attendance for the Department of Fisheries and Aquaculture Stakeholder it would have been Tom *Dooley* and not Tom Duly who attended.

There is a recurring mention within the Environmental Assessment about the utilization of a 7 day temporal pre-research survey separation. It is the understanding of the FFAW|Unifor that this is being accepted by DFO when it comes to their Spring and Fall 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 would suggest that in the document when there is any mention of the 7 day temporal separation, it has to specify what science context this applies. Any possible impact, be it negative or positive, on the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab cannot be accepted.

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 petroleum exploration and harvesting activities. I thank you for providing an opportunity for the

FFAW | Unifor to comment on the **Multi Klient Invest AS (MKI) & TGS-NOPEC Geophysical Company ASA (TGS) Southern Grand Banks 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