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Tuesday, February 10, 2015

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,

The Fish, Food and Allied Workers Union (FFAW-Unifor) would like to respectfully submit the following comments in connection with the "Amendment to the Environmental Assessment of MKI's Southern Grand Banks Seismic Program, 2014-2018". FFAW-Unifor engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador (NL).

The commercial fishery is very important to the many rural communities in NL. Members of FFAW-Unifor live in communities and rely on the resources covered by the spatial boundaries of this program.

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

- The document suggests that attempting to "avoid high concentrations of fishing vessels to the greatest extent possible" is an acceptable mitigation. FFAW-Unifor maintains now, as was done last year in the full Environmental Assessment (EA) process, that avoidance of active fishing grounds is paramount.
- In a similar line of thought from last year's process, science is also to be avoided. "Avoidance to the greatest extent possible" is not sufficiently committed language. Further, there has to be differentiation in the fisheries science activities, as was indicated in previous submissions.
- The text suggests that 3-D Seismic activity does have a greater challenge of mitigation and intensity of exposure, yet there is no mention of this being re-evaluated in the considerations for the Valued Environmental Components.

Notwithstanding the above, it is evident that the "Amendment to the Environmental Assessment of MKI's Southern Grand Banks Seismic Program, 2014-2018" does not address the outstanding issues from the original Environmental Assessment process. By including 3-D it is ever more important to avoid fishing grounds, as the increased exposure and number of streamers will result in challenges in maneuverability and chances of encountering gear in the water.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison
