
KEITH SULLIVAN
President

DAVID DECKER
Secretary-Treasurer

Tuesday, April 07, 2015

Darren Hicks
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water Street, 5th Floor, TD Place
St. John's

Mr. Hicks,

Re: Multi Klient Invest AS Southern Grand Banks Seismic Program, 2014-2018 Amendment

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 MKIø'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 these 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:

- FFAW-Unifor would suggest that avoidance of fishing gear and interference should be explicit. Not just "to the greatest extent possible". The same would go for fisheries science, as any impact on these could have significant detrimental impacts on people in the fishery.
- Question on longer term implications from continual exposure of groundfish harvesting grounds to 3D Seismic is not well understood in NL. The only area to have a commercial Cod harvest would be encompassed in the Southern Grand Banks Seismic Program Project Area.
- It remains hard to accept that between-project cumulative effects will be not significant. An increased level of exposure to seismic activity is bound to have an impact on marine biota.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program has seismic vessels operating within active harvesting areas and other petroleum exploration projects. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

Jóhan Joensen
Petroleum Industry Liaison
