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Friday, January 10, 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,

The Fish, Food and Allied Workers Union (FFAW) would like to respectfully submit the following comments in connection with the Scoping and Project Description Documents for the Multi Klient Invest AS (MKI) **Southern Grand Banks Seismic Program, 2014-2018**. The FFAW engages in reviews and consultations with the Petroleum Industry on behalf of our far-reaching membership throughout the province of Newfoundland and Labrador.

The FFAW wants to indicate that it has the expertise to engage in the Environmental Assessment process. The lead contact within the FFAW would be the Petroleum Industry Liaison ([REDACTED]), who would further source the expertise of the pertinent sections of the membership of the organization. This expertise relates to the consultation processes and also experienced knowledge of the marine environment in which the petroleum industry is currently operating.

Having reviewed the Scoping Document and the Project Description, the FFAW has the following quick observations:

- The Project Area is of such a size that it covers a multitude of harvesting activities throughout a calendar year, this is in addition to the sensitive life cycles of the species found in this area.
- It is worth noting that the M/V Sanco Spirit is registered in Gibraltar and not Norway as stated in the Project Description. This is an unfortunate oversight from the proponent as the parent company is the owner of the vessel.
- The FFAW would like to emphasise that the crew on the picket vessel have to be well informed on the operational procedures in Newfoundland and Labrador waters. This has been brought up as an issue with the Blain M. in the past.
- It is also worth to mention that the Study and Project Areas have changed significantly from what was provided to the FFAW prior to any submission to the C-NLOPB. This of course can be explained by virtue of the company not having fully defined the area in question at that time.
- When it comes to the temporal scope of the work being proposed, the FFAW emphasises the importance of avoiding the Industry-DFO Collaborative Post-Season Trap Survey for Snow Crab and this needs to be specifically listed in the Scoping Document. This would entail avoidance until the stations have been completed.

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 will have the seismic vessel operating close

to and within various areas. The Petroleum Industry Liaison with the FFAW is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

Yours truly,

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Petroleum Industry Liaison